

Before Starting the CoC Application

The CoC Consolidated Application is made up of two parts: the CoC Application and the CoC Priority Listing, with all of the CoC's project applications either approved and ranked, or rejected. The Collaborative Applicant is responsible for submitting both the CoC Application and the CoC Priority Listing in order for the CoC Consolidated Application to be considered complete.

The Collaborative Applicant is responsible for:

- Reviewing the FY 2015 CoC Program Competition NOFA in its entirety for specific application and program requirements.
- Using the CoC Application Detailed Instructions for assistance with completing the application in e-snaps.
- Answering all questions in the CoC Application. It is the responsibility of the Collaborative Applicant to ensure that all imported and new responses in all parts of the application are fully reviewed and completed. When doing so, please keep in mind that:
 - This year, CoCs will see that a few responses have been imported from the FY 2013/FY 2014 CoC Application. Due to significant changes to the CoC Application questions, most of the responses from the FY 2013/FY 2014 CoC Application could not be imported.
 - For some questions, HUD has provided documents to assist Collaborative Applicants in filling out responses.
 - For other questions, the Collaborative Applicant must be aware of responses provided by project applicants in their Project Applications.
 - Some questions require that the Collaborative Applicant attach a document to receive credit. This will be identified in the question.
 - All questions marked with an asterisk (*) are mandatory and must be completed in order to submit the CoC Application.

For Detailed Instructions click [here](#).

1A. Continuum of Care (CoC) Identification

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1A-1. CoC Name and Number: AZ-500 - Arizona Balance of State CoC

1A-2. Collaborative Applicant Name: Arizona Department of Housing

1A-3. CoC Designation: CA

1A-4. HMIS Lead: Arizona Department of Housing

1B. Continuum of Care (CoC) Engagement

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1B-1. From the list below, select those organizations and persons that participate in CoC meetings. Then select "Yes" or "No" to indicate if CoC meeting participants are voting members or if they sit on the CoC Board. Only select "Not Applicable" if the organization or person does not exist in the CoC's geographic area.

Organization/Person Categories	Participates in CoC Meetings	Votes, including electing CoC Board	Sits on CoC Board
Local Government Staff/Officials	Yes	Yes	Yes
CDBG/HOME/ESG Entitlement Jurisdiction	Yes	Yes	Yes
Law Enforcement	Yes	No	No
Local Jail(s)	No	No	No
Hospital(s)	No	No	No
EMT/Crisis Response Team(s)	No	No	No
Mental Health Service Organizations	Yes	Yes	No
Substance Abuse Service Organizations	Yes	Yes	No
Affordable Housing Developer(s)	No	No	No
Public Housing Authorities	Yes	Yes	Yes
CoC Funded Youth Homeless Organizations	No	No	No
Non-CoC Funded Youth Homeless Organizations	Yes	Yes	No
School Administrators/Homeless Liaisons	Yes	No	No
CoC Funded Victim Service Providers	Yes	Yes	No
Non-CoC Funded Victim Service Providers	Yes	Yes	No
Street Outreach Team(s)	Yes	Yes	Yes
Youth advocates	Yes	Yes	No
Agencies that serve survivors of human trafficking	Yes	Yes	No
Other homeless subpopulation advocates	Yes	Yes	Yes
Homeless or Formerly Homeless Persons	Yes	Yes	Yes
Other includes homeless coalition, DV shelters, pocket shelters, community agencies provides support such as food and showers.	Yes	No	No

**1B-1a. Describe in detail how the CoC solicits and considers the full range of opinions from individuals or organizations with knowledge of homelessness in the geographic area or an interest in preventing and ending homelessness in the geographic area. Please provide two examples of organizations or individuals from the list in 1B-1 to answer this question.
(limit 1000 characters)**

Full range of opinions: The AZBOSCOC convenes quarterly regional meetings around the state and every meeting is an opportunity for individuals and organizations to participate in the discussion of preventing & ending homelessness. In addition, the BOSCOC Advisory Board has a representative from each region & each one represents a different category, i.e. local gov't., PHA, formerly homeless, outreach etc. Data is presented and discussed as work on local strategic plans continues to serve those in need of housing. The CA also attends the local meetings to address specific emergent issues in the community.

Example 1: The BOSCOC convenes meetings with the Regional Behavioral Health Authorities for the purposes of leveraging housing resources between the two systems effectively. Example 2: ADOH currently has TA contract with CSH to outreach to PHAs in the BOSCOC to revise admin plans to prioritize persons who are homeless.

1B-1b. List Runaway and Homeless Youth (RHY)-funded and other youth homeless assistance providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Youth Service Provider (up to 10)	RHY Funded?	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on the CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
CODAC Yavapai House Youth Shelter	Yes	Yes	No
Arizona Youth Partnership	Yes	Yes	No
Arizona Children's Association	No	No	No
Association for Supportive Child Care	No	No	No
CAC WIA Youth Program	No	No	No

1B-1c. List the victim service providers (CoC Program and non-CoC Program funded) who operate within the CoC's geographic area. Then select "Yes" or "No" to indicate if each provider is a voting member or sits on the CoC Board.

Victim Service Provider for Survivors of Domestic Violence (up to 10)	Participated as a Voting Member in at least two CoC Meetings within the last 12 months (between October 1, 2014 and November 15, 2015).	Sat on CoC Board as active member or official at any point during the last 12 months (between October 1, 2014 and November 15, 2015).
Against Abuse	Yes	No
AZ Coaliton to End Social and Domestic Violence	Yes	No
Domestic Violence Services Safe Home	No	No
KIngman Aid to Abused People	Yes	No
Alice's Place	No	No
CCS of Southern -Hope House, Nuestra Casa, SAFE House	No	No
CRRCC	Yes	No
On Eagle's Wings	No	No
Mt. Graham Safe House	No	No
Page Regional DV Services	No	No

1B-2. Does the CoC intend to meet the timelines for ending homelessness as defined in Opening Doors?

Opening Doors Goal	CoC has established timeline?
End Veteran Homelessness by 2015	No
End Chronic Homelessness by 2017	Yes
End Family and Youth Homelessness by 2020	Yes
Set a Path to End All Homelessness by 2020	Yes

**1B-3. How does the CoC identify and assign the individuals, committees, or organizations responsible for overseeing implementation of specific strategies to prevent and end homelessness in order to meet the goals of Opening Doors?
(limit 1000 characters)**

The BOSCOCC ensures geographic representation on the standing committees. Members include sub recipients and community organizations representing areas such as crisis services, food pantries, and shelters. All sub recipients are required to participate. There are also community specific self-governing CoC network groups that address community specific issues. Mohave County's local meeting has initiated discussion about formalizing policies to not criminalize persons who are homeless. New initiatives related to employment have been implemented in both the north and south parts of the BOSCOCC. The initiatives include outreach to employers to hire veterans. The RBHAs have employment specialists dedicated to working with community organizations and businesses around job creation for homeless persons who have mental health issues. ADOH ensures collaboration with SOAR by participating on the statewide steering committee and has ensured that SOAR training occurred throughout the BOSCOCC.

**1B-4. Explain how the CoC is open to proposals from entities that have not previously received funds in prior CoC Program competitions, even if the CoC is not applying for any new projects in 2015.
(limit 1000 characters)**

A Request for Proposal is sent to everyone who has ever attended a BOSCOCC meeting. This mailing list includes current sub recipients as well as a broad range of community based organizations and individuals. Every local COC or Network of Care also received the RFP and is asked to share with their entire network of attendees. Other broad networks included on the list are education, behavioral health, health care, shelter, and faith based organizations. There is no requirement that an agency has to have previously received COC program funds. In addition the RFP is posted on the ADOH website.

1B-5. How often does the CoC invite new members to join the CoC through a publicly available invitation?

Quarterly

1C. Continuum of Care (CoC) Coordination

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1C-1. Does the CoC coordinate with other Federal, State, local, private and other entities serving homeless individuals and families and those at risk of homelessness in the planning, operation and funding of projects? Only select "Not Applicable" if the funding source does not exist within the CoC's geographic area.

Funding or Program Source	Coordinates with Planning, Operation and Funding of Projects
Housing Opportunities for Persons with AIDS (HOPWA)	Yes
Temporary Assistance for Needy Families (TANF)	Yes
Runaway and Homeless Youth (RHY)	Yes
HeadStart Program	Yes
Other housing and service programs funded through Federal, State and local government resources.	Yes

1C-2. The McKinney-Vento Act, as amended, requires CoCs to participate in the Consolidated Plan(s) (Con Plan(s)) for the geographic area served by the CoC. The CoC Program interim rule at 24 CFR 578.7(c)(4) requires that the CoC provide information required to complete the Con Plan(s) within the CoC's geographic area, and 24 CFR 91.100(a)(2)(i) and 24 CFR 91.110(b)(1) requires that the State and local Con Plan jurisdiction(s) consult with the CoC. The following chart asks for information about CoC and Con Plan jurisdiction coordination, as well as CoC and ESG recipient coordination.

CoCs can use the CoCs and Consolidated Plan Jurisdiction Crosswalk to assist in answering this question.

	Number	Percentage
Number of Con Plan jurisdictions with whom the CoC geography overlaps	6	
How many Con Plan jurisdictions did the CoC participate with in their Con Plan development process?	5	83.33%
How many Con Plan jurisdictions did the CoC provide with Con Plan jurisdiction level PIT data?	5	83.33%
How many of the Con Plan jurisdictions are also ESG recipients?	1	
How many ESG recipients did the CoC participate with to make ESG funding decisions?	1	100.00%
How many ESG recipients did the CoC consult with in the development of ESG performance standards and evaluation process for ESG funded activities?	1	100.00%

**1C-2a. Based on the responses selected in 1C-2, describe in greater detail how the CoC participates with the Consolidated Plan jurisdiction(s) located in the CoC's geographic area and include the frequency, extent, and type of interactions between the CoC and the Consolidated Plan jurisdiction(s).
(limit 1000 characters)**

The Flagstaff, Prescott, and Yuma Consolidated Plan jurisdictions are active in the BOSCO. Each one has a voting member that attends meetings. ADOH is the lead agency for the statewide Consolidated Plan and as the Collaborative Applicant and grantee for the BOSCO their involvement is daily. Douglas and Sierra Vista became their own jurisdictions a year ago and as such are not as involved as the entire process is brand new and Casa Grande became their own jurisdiction July 1, 2015, but did call and ask for PIT data for their Con Plan. The BOSCO is reaching out to the new jurisdictions and feel confident that they will become active in the BOSCO.

**1C-2b. Based on the responses selected in 1C-2, describe how the CoC is working with ESG recipients to determine local ESG funding decisions and how the CoC assists in the development of performance standards and evaluation of outcomes for ESG-funded activities.
(limit 1000 characters)**

The ESG recipient (Department of Economic Security) held meetings around the state in conjunction with the BOSCO and then issued their RFP's for the varying services. DES awards contracts every three (3) to five (5) years through a competitive RFP process. ESG is funded at \$980,018 but the ESG Recipient, Department of Economic Security, combines the ESG with additional funding including TANF, SSBG, state homeless monies and State Lottery funds for a total of \$5,858,613 which is allocated to 15 different agencies throughout the state, 29% of the funds are disbursed in the BOS. Many of the agencies receiving ESG also have COC funded programs and this increases coordination and effective use of funds. An ESG grantee representative attends a regional meeting each quarter as well as the statewide meeting held each October. There is also an ESG Collaborative that meets monthly which includes ADOH, DES and sub-recipients.

**1C-3. Describe the how the CoC coordinates with victim service providers and non-victim service providers (CoC Program funded and non-CoC funded) to ensure that survivors of domestic violence are provided housing and services that provide and maintain safety and security. Responses must address how the service providers ensure and maintain the safety and security of participants and how client choice is upheld.
(limit 1000 characters)**

The BOSCOG coordinates with victim/non-victim service providers. The organizations are included in systemwide emails and are invited to regional meetings. COC sub recipients serve survivors and work closely with the DV shelters to ensure individuals have access to resources. Safety plans are developed to ensure individuals know how to maintain their own safety and are able to contact law enforcement if needed. Client choice is provided based on the community where they wish to reside. Victim service providers have cooperated in participating in the yearly housing inventory count. Though they don't participate in HMIS, they consistently respond to the yearly survey sent. The information provided is compiled with other regional data and is provided at the regional meetings so that agencies have additional information to consider as they plan for local programming. ADOH represents the BOSCOG on the statewide advisory committee related to victim services.

1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. If there are more than 5 PHAs within the CoC's geographic area, list the 5 largest PHAs. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between October 1, 2014 and March 31, 2015, and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program. (Full credit consideration may be given for the relevant excerpt from the PHA's administrative planning document(s) clearly showing the PHA's homeless preference, e.g. Administration Plan, Admissions and Continued Occupancy Policy (ACOP), Annual Plan, or 5-Year Plan, as appropriate).

Public Housing Agency Name	% New Admissions into Public Housing and Housing Choice Voucher Program from 10/1/14 to 3/31/15 who were homeless at entry	PHA has General or Limited Homeless Preference
Williams Housing Authority		No
Yuma City Housing Authority		No
Winslow Public Housing Authority		No
Pinal County Housing Authority	0.00%	Yes-HCV
Housing Authority of Cochise County	1.00%	Yes-HCV

If you select "Yes--Public Housing," "Yes--HCV," or "Yes--Both" for "PHA has general or limited homeless preference," you must attach documentation of the preference from the PHA in order to receive credit.

**1C-5. Other than CoC, ESG, Housing Choice Voucher Programs and Public Housing, describe other subsidized or low-income housing opportunities that exist within the CoC that target persons experiencing homelessness.
(limit 1000 characters)**

Both VASH and SSVF target persons experiencing homelessness and these programs exist in all but 2 counties out of 13. Some counties have faith based agencies that provide more of a transitional housing model in assisting, primarily families, regain their stability by finding employment and housing they can afford. Salvation Army does this in Navajo and Apache counties, Catholic Community Services in Yuma for women, non-denominational sect in Graham County for single men only, and Gila County has a house for families operated by the County Housing Dept.

1C-6. Select the specific strategies implemented by the CoC to ensure that homelessness is not criminalized in the CoC's geographic area. Select all that apply. For "Other," you must provide a description (2000 character limit)

Engaged/educated local policymakers:	<input type="checkbox"/>
Engaged/educated law enforcement:	<input checked="" type="checkbox"/>
Implemented communitywide plans:	<input type="checkbox"/>
No strategies have been implemented:	<input type="checkbox"/>
Working relationships with county and federal probation to prevent homelessness. One sub recipient leverages the delivery of transitional shelter for federal offenders as a service to ensure individuals do not return to the streets.	<input checked="" type="checkbox"/>
Sub recipient programs are known to local Law Enforcement and probation officers will make referrals to the programs so that individuals have an alternative to being on the streets.	<input checked="" type="checkbox"/>
Some communities have SMI, Drug, and Veteran Courts in place that provide an opportunity for individuals to access services and treatment without going through the criminal justice system.	<input checked="" type="checkbox"/>

1D. Continuum of Care (CoC) Discharge Planning

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1D-1. Select the systems of care within the CoC's geographic area for which there is a discharge policy in place that is mandated by the State, the CoC, or another entity for the following institutions? Check all that apply.

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

1D-2. Select the systems of care within the CoC's geographic area with which the CoC actively coordinates to ensure that institutionalized persons that have resided in each system of care for longer than 90 days are not discharged into homelessness. Check all that apply.

Foster Care:	<input checked="" type="checkbox"/>
Health Care:	<input checked="" type="checkbox"/>
Mental Health Care:	<input checked="" type="checkbox"/>
Correctional Facilities:	<input checked="" type="checkbox"/>
None:	<input type="checkbox"/>

**1D-2a. If the applicant did not check all boxes in 1D-2, explain why there is no coordination with the institution(s) and explain how the CoC plans to coordinate with the institution(s) to ensure persons discharged are not discharged into homelessness.
(limit 1000 characters)**

Not applicable.

1E. Centralized or Coordinated Assessment (Coordinated Entry)

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

CoCs are required by the CoC Program interim rule to establish a Centralized or Coordinated Assessment system – also referred to as Coordinated Entry. Based on the recent Coordinated Entry Policy Brief, HUD’s primary goals for coordinated entry processes are that assistance be allocated as effectively as possible and that it be easily accessible regardless of where or how people present for assistance. Most communities lack the resources needed to meet all of the needs of people experiencing homelessness. This combined with the lack of a well-developed coordinated entry processes can result in severe hardships for persons experiencing homelessness who often face long wait times to receive assistance or are screened out of needed assistance. Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs to ensure that people who need assistance the most can receive it in a timely manner. Coordinated entry processes also provide information about service needs and gaps to help communities plan their assistance and identify needed resources.

**1E-1. Explain how the CoC’s coordinated entry process is designed to identify, engage, and assist homeless individuals and families that will ensure those who request or need assistance are connected to proper housing and services.
(limit 1000 characters)**

The BOSCOC has a "no wrong door" policy for coordinated entry (CE). The VI-SPDAT is used to determine acuity and to assist in assessing referrals and eligibility for projects within the COC. CE is managed through HMIS and data is shared across the COC. Per HUD Notice CPD-14-012, priority is given to those individuals and families who are chronically homeless. Only when there is not an eligible household that meets the definition of chronic homeless, is a household with the highest acuity score housed. Those entities that do not use or do not share data i.e. DV, HOPWA & RHY participate through local COC & Network of Care meetings in order to assist their clients with locating the most appropriate housing while they continue to provide needed services. Four of the 13 counties have PATH teams and the other counties rely on referrals from faith based agencies, other not for profits & collaboration with law enforcement for outreach& engagement. The 211 system operates statewide as well.

1E-2. CoC Program and ESG Program funded projects are required to participate in the coordinated entry process, but there are many other organizations and individuals who may participate but are not required to do so. From the following list, for each type of organization or individual, select all of the applicable checkboxes that indicate how that organization or individual participates in the CoC's coordinated entry process. If the organization or person does not exist in the CoC's geographic area, select "Not Applicable." If there are other organizations or persons that participate not on this list, enter the information, click "Save" at the bottom of the screen, and then select the applicable checkboxes.

Organization/Person Categories	Participates in Ongoing Planning and Evaluation	Makes Referrals to the Coordinated Entry Process	Receives Referrals from the Coordinated Entry Process	Operates Access Point for Coordinated Entry Process	Participates in Case Conferencing	Not Applicable
Local Government Staff/Officials	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
CDBG/HOME/Entitlement Jurisdiction	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Law Enforcement	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Local Jail(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hospital(s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
EMT/Crisis Response Team(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Mental Health Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Substance Abuse Service Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Affordable Housing Developer(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Public Housing Authorities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-CoC Funded Youth Homeless Organizations	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
School Administrators/Homeless Liaisons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Non-CoC Funded Victim Service Organizations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Street Outreach Team(s)	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Homeless or Formerly Homeless Persons	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

1F. Continuum of Care (CoC) Project Review, Ranking, and Selection

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1F-1. For all renewal project applications submitted in the FY 2015 CoC Program Competition complete the chart below regarding the CoC's review of the Annual Performance Report(s).

How many renewal project applications were submitted in the FY 2015 CoC Program Competition?	27
How many of the renewal project applications are first time renewals for which the first operating year has not expired yet?	0
How many renewal project application APRs were reviewed by the CoC as part of the local CoC competition project review, ranking, and selection process for the FY 2015 CoC Program Competition?	27
Percentage of APRs submitted by renewing projects within the CoC that were reviewed by the CoC in the 2015 CoC Competition?	100.00%

1F-2. In the sections below, check the appropriate box(s) for each section to indicate how project applications were reviewed and ranked for the FY 2015 CoC Program Competition. (Written documentation of the CoC's publicly announced Rating and Review procedure must be attached.)

Type of Project or Program (PH, TH, HMIS, SSO, RRH, etc.)	<input checked="" type="checkbox"/>
Performance outcomes from APR reports/HMIS	
Length of stay	<input checked="" type="checkbox"/>
% permanent housing exit destinations	<input checked="" type="checkbox"/>
% increases in income	<input checked="" type="checkbox"/>
	<input type="checkbox"/>

Monitoring criteria	
Participant Eligibility	<input checked="" type="checkbox"/>
Utilization rates	<input checked="" type="checkbox"/>
Drawdown rates	<input checked="" type="checkbox"/>
Frequency or Amount of Funds Recaptured by HUD	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
Need for specialized population services	
Youth	<input type="checkbox"/>
Victims of Domestic Violence	<input checked="" type="checkbox"/>
Families with Children	<input checked="" type="checkbox"/>
Persons Experiencing Chronic Homelessness	<input checked="" type="checkbox"/>
Veterans	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
None	<input type="checkbox"/>

1F-2a. Describe how the CoC considered the severity of needs and vulnerabilities of participants that are, or will be, served by the project applications when determining project application priority. (limit 1000 characters)

As a part of determining project application priority, sub recipients' utilization of the VI-SPDAT as a part of coordinated entry is reviewed as well as implementation of housing first strategies. Points are assigned for these activities as part of an overall scoring of the renewal project. All sub recipients have been trained in the use of the VI-SPDAT and the coordinated entry process. When persons who have a high score cannot be engaged in the program, sub recipients make referrals to community behavioral health and substance abuse treatment programs or other specialty services so the individual/family can access services needed.

All sub recipients are implementing strategies to ensure that persons and families who meet the definition of chronic homeless are considered a priority when vacancies occur.

**1F-3. Describe how the CoC made the local competition review, ranking, and selection criteria publicly available, and identify the public medium(s) used and the date(s) of posting. In addition, describe how the CoC made this information available to all stakeholders. (Evidence of the public posting must be attached)
(limit 750 characters)**

The BOSCO uses two primary venues to publicly share review, ranking and selection criteria. 1) Information is emailed to a broad mailing list of individuals and organizations who have expressed interest in or has participated in continuum of care activities including training, local, regional, and statewide meetings. 2) Review, ranking and selection criteria and outcomes are also posted on the Arizona Department of Housing website. Again an announcement is sent out to a broad group of individuals and agencies to inform them of the availability of the information on the Arizona Department of Housing website.

1F-4. On what date did the CoC and Collaborative Applicant publicly post all parts of the FY 2015 CoC Consolidated Application that included the final project application ranking? (Written documentation of the public posting, with the date of the posting clearly visible, must be attached. In addition, evidence of communicating decisions to the CoC's full membership must be attached.)

11/19/2015

1F-5. Did the CoC use the reallocation process in the FY 2015 CoC Program Competition to reduce or reject projects for the creation of new projects? (If the CoC utilized the reallocation process, evidence of the public posting of the reallocation process must be attached.)

No

1F-5a. If the CoC rejected project application(s) on what date did the CoC and Collaborative Applicant notify those project applicants their project application was rejected in the local CoC competition process? (If project applications were rejected, a copy of the written notification to each project applicant must be attached.)

1F-6. Is the Annual Renewal Demand (ARD) in the CoC's FY 2015 CoC Priority Listing equal to or less than the ARD on the final HUD-approved FY 2015 GIW? Yes

1G. Continuum of Care (CoC) Addressing Project Capacity

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

1G-1. Describe how the CoC monitors the performance of CoC Program recipients. (limit 1000 characters)

HMIS bi-annual reports are run for the HUD established performance goals and analyzed by ADOH contract specialists. The Coordinated Entry is tracked and analyzed weekly as the BOSCO works with the participating agencies to fully understand and utilize CE. ADOH as the grantee monitors monthly upon receipt of request for payment for various things such as turnover, expenditure rate and evidence of client income increases (TTP increases). More in-depth analysis occurs during the annual on-site monitoring visit and includes HMIS procedures and security systems.

General reports from ADOH as the Lead Agency are shared with the BOSCO Governance Committee via quarterly meetings and with the BOSCO membership at large during quarterly Regional meetings.

1G-2. Did the Collaborative Applicant review and confirm that all project applicants attached accurately completed and current dated form HUD 50070 and form HUD-2880 to the Project Applicant Profile in e-snaps?

Yes

1G-3. Did the Collaborative Applicant include accurately completed and appropriately signed form HUD-2991(s) for all project applications submitted on the CoC Priority Listing?

Yes

2A. Homeless Management Information System (HMIS) Implementation

Intructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2A-1. Does the CoC have a governance charter that outlines the roles and responsibilities of the CoC and the HMIS Lead, either within the charter itself or by reference to a separate document like an MOU? In all cases, the CoC's governance charter must be attached to receive credit. In addition, if applicable, any separate document, like an MOU, must also be attached to receive credit. Yes

2A-1a. Include the page number where the roles and responsibilities of the CoC and HMIS Lead can be found in the attached document referenced in 2A-1. In addition, in the textbox indicate if the page number applies to the CoC's attached governance charter or the attached MOU. 8 & 9

2A-2. Does the CoC have a HMIS Policies and Procedures Manual? If yes, in order to receive credit the HMIS Policies and Procedures Manual must be attached to the CoC Application. Yes

2A-3. Are there agreements in place that outline roles and responsibilities between the HMIS Lead and the Contributing HMIS Organizations (CHOs)? Yes

2A-4. What is the name of the HMIS software used by the CoC (e.g., ABC Software)?
Applicant will enter the HMIS software name (e.g., ABC Software).

Service Point

2A-5. What is the name of the HMIS software vendor (e.g., ABC Systems)?
Applicant will enter the name of the vendor (e.g., ABC Systems).

Bowman Systems

2B. Homeless Management Information System (HMIS) Funding Sources

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2B-1. Select the HMIS implementation coverage area: Single CoC

* 2B-2. In the charts below, enter the amount of funding from each funding source that contributes to the total HMIS budget for the CoC.

2B-2.1 Funding Type: Federal - HUD

Funding Source	Funding
CoC	\$213,250
ESG	\$0
CDBG	\$0
HOME	\$0
HOPWA	\$0
Federal - HUD - Total Amount	\$213,250

2B-2.2 Funding Type: Other Federal

Funding Source	Funding
Department of Education	\$0
Department of Health and Human Services	\$2,646
Department of Labor	\$0
Department of Agriculture	\$0
Department of Veterans Affairs	\$14,856
Other Federal	\$0
Other Federal - Total Amount	\$17,502

2B-2.3 Funding Type: State and Local

Funding Source	Funding
City	\$0
County	\$0
State	\$35,811
State and Local - Total Amount	\$35,811

2B-2.4 Funding Type: Private

Funding Source	Funding
Individual	\$0
Organization	\$0
Private - Total Amount	\$0

2B-2.5 Funding Type: Other

Funding Source	Funding
Participation Fees	\$0
Other - Total Amount	\$0

2B-2.6 Total Budget for Operating Year	\$266,563
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2C. Homeless Management Information System (HMIS) Bed Coverage

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2C-1. Enter the date the CoC submitted the 2015 HIC data in HDX, (mm/dd/yyyy): 05/14/2015

2C-2. Per the 2015 Housing Inventory Count (HIC) indicate the number of beds in the 2015 HIC and in HMIS for each project type within the CoC. If a particular housing type does not exist in the CoC then enter "0" for all cells in that housing type.

Project Type	Total Beds in 2015 HIC	Total Beds in HIC Dedicated for DV	Total Beds in HMIS	HMIS Bed Coverage Rate
Emergency Shelter beds	926	354	495	86.54%
Safe Haven (SH) beds	0	0	0	
Transitional Housing (TH) beds	256	22	234	100.00%
Rapid Re-Housing (RRH) beds	389	0	389	100.00%
Permanent Supportive Housing (PSH) beds	773	0	773	100.00%
Other Permanent Housing (OPH) beds	257	0	6	2.33%

**2C-2a. If the bed coverage rate for any housing type is 85% or below, describe how the CoC plans to increase this percentage over the next 12 months.
(limit 1000 characters)**

We continue to encourage and discuss advantages to all programs if the VA and/or the PHA's would input VASH recipients into the HMIS system. The AZBOSCOC is not limited to programs that only serve those who meet the definition of homeless but is open to those affordable housing programs that serve those who are poor, may be homeless, have been homeless and are in need of what the affordable housing system has to offer both in shelter, homes and services.

**2C-3. HUD understands that certain projects are either not required to or discouraged from participating in HMIS, and CoCs cannot require this if they are not funded through the CoC or ESG programs. This does NOT include domestic violence providers that are prohibited from entering client data in HMIS. If any of the project types listed in question 2C-2 above has a coverage rate of 85% or below, and some or all of these rates can be attributed to beds covered by one of the following programs types, please indicate that here by selecting all that apply from the list below.
(limit 1000 characters)**

VA Domiciliary (VA DOM):	<input type="checkbox"/>
VA Grant per diem (VA GPD):	<input type="checkbox"/>
Faith-Based projects/Rescue mission:	<input type="checkbox"/>
Youth focused projects:	<input type="checkbox"/>
HOPWA projects:	<input type="checkbox"/>
Not Applicable:	<input checked="" type="checkbox"/>

2C-4. How often does the CoC review or assess its HMIS bed coverage? Quarterly

2D. Homeless Management Information System (HMIS) Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2D-1. Indicate the percentage of unduplicated client records with null or missing values and the percentage of "Client Doesn't Know" or "Client Refused" during the time period of October 1, 2013 through September 30, 2014.

Universal Data Element	Percentage Null or Missing	Percentage Client Doesn't Know or Refused
3.1 Name	0%	0%
3.2 Social Security Number	2%	2%
3.3 Date of birth	0%	0%
3.4 Race	1%	0%
3.5 Ethnicity	1%	1%
3.6 Gender	0%	0%
3.7 Veteran status	1%	0%
3.8 Disabling condition	3%	0%
3.9 Residence prior to project entry	3%	0%
3.10 Project Entry Date	0%	0%
3.11 Project Exit Date	0%	0%
3.12 Destination	16%	23%
3.15 Relationship to Head of Household	4%	0%
3.16 Client Location	7%	0%
3.17 Length of time on street, in an emergency shelter, or safe haven	14%	0%

2D-2. Identify which of the following reports your HMIS generates. Select all that apply:

CoC Annual Performance Report (APR):	<input checked="" type="checkbox"/>
ESG Consolidated Annual Performance and Evaluation Report (CAPER):	<input type="checkbox"/>
Annual Homeless Assessment Report (AHAR) table shells:	<input checked="" type="checkbox"/>

	<input type="checkbox"/>
None	<input type="checkbox"/>

2D-3. If you submitted the 2015 AHAR, how many AHAR tables (i.e., ES-ind, ES-family, etc) were accepted and used in the last AHAR? 12

2D-4. How frequently does the CoC review data quality in the HMIS? Quarterly

2D-5. Select from the dropdown to indicate if standardized HMIS data quality reports are generated to review data quality at the CoC level, project level, or both? Both Project and CoC

2D-6. From the following list of federal partner programs, select the ones that are currently using the CoC's HMIS.

VA Supportive Services for Veteran Families (SSVF):	<input checked="" type="checkbox"/>
VA Grant and Per Diem (GPD):	<input type="checkbox"/>
Runaway and Homeless Youth (RHY):	<input checked="" type="checkbox"/>
Projects for Assistance in Transition from Homelessness (PATH):	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

2D-6a. If any of the federal partner programs listed in 2D-6 are not currently entering data in the CoC's HMIS and intend to begin entering data in the next 12 months, indicate the federal partner program and the anticipated start date. (limit 750 characters)

N/A

2E. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

The data collected during the PIT count is vital for both CoCs and HUD. Communities need accurate data to determine the size and scope of homelessness at the local level so they can best plan for services and programs that will appropriately address local needs and measure progress in addressing homelessness. HUD needs accurate data to understand the extent and nature of homelessness throughout the country, and to provide Congress and the Office of Management and Budget (OMB) with information regarding services provided, gaps in service, and performance. This information helps inform Congress' funding decisions, and it is vital that the data reported is accurate and of high quality.

2E-1. Did the CoC approve the final sheltered PIT count methodology for the 2015 sheltered PIT count? Yes

2E-2. Indicate the date of the most recent sheltered PIT count (mm/dd/yyyy): 01/27/2015

2E-2a. If the CoC conducted the sheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD? Not Applicable

2E-3. Enter the date the CoC submitted the sheltered PIT count data in HDX, (mm/dd/yyyy): 05/14/2015

2F. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2F-1. Indicate the method(s) used to count sheltered homeless persons during the 2015 PIT count:

Complete Census Count:	<input checked="" type="checkbox"/>
Random sample and extrapolation:	<input type="checkbox"/>
Non-random sample and extrapolation:	<input type="checkbox"/>
Survey of Providers	<input checked="" type="checkbox"/>

2F-2. Indicate the methods used to gather and calculate subpopulation data for sheltered homeless persons:

HMIS:	<input checked="" type="checkbox"/>
HMIS plus extrapolation:	<input type="checkbox"/>
Interview of sheltered persons:	<input type="checkbox"/>
Sample of PIT interviews plus extrapolation:	<input type="checkbox"/>
Agency level surveys of DV agencies and other pocket shelters that don't enter in HMIS	<input checked="" type="checkbox"/>

**2F-3. Provide a brief description of your CoC's sheltered PIT count methodology and describe why your CoC selected its sheltered PIT count methodology.
(limit 1000 characters)**

The BOSCO used two methods--data from HMIS and agency level surveys from agencies that do not use HMIS--i.e. domestic violence shelters and small pocket shelters. HMIS is used because it provides the most accurate data for the sheltered PIT count. Our HMIS agency works closely with sub recipients to review data and ensure accuracy. Agency level surveys are used in order to gather information from those agencies that don't enter into HMIS in order that the sheltered PIT represents as many programs as feasible.

2F-4. Describe any change in methodology from your sheltered PIT count in 2014 to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to the implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the PIT count). (limit 1000 characters)

N/A

2F-5. Did your CoC change its provider coverage in the 2015 sheltered count? No

2F-5a. If "Yes" in 2F-5, then describe the change in provider coverage in the 2015 sheltered count. (limit 750 characters)

Not applicable.

2G. Continuum of Care (CoC) Sheltered Point-in-Time (PIT) Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2G-1. Indicate the methods used to ensure the quality of the data collected during the sheltered PIT count:

Training:	<input checked="" type="checkbox"/>
Provider follow-up:	<input checked="" type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Non-HMIS de-duplication techniques:	<input type="checkbox"/>
	<input type="checkbox"/>

2G-2. Describe any change to the way your CoC implemented its sheltered PIT count from 2014 to 2015 that would change data quality, including changes to training volunteers and inclusion of any partner agencies in the sheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual sheltered PIT count methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)

N/A

2H. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

The unsheltered PIT count assists communities and HUD to understand the characteristics and number of people with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground. CoCs are required to conduct an unsheltered PIT count every 2 years (biennially) during the last 10 days in January; however, CoCs are strongly encouraged to conduct the unsheltered PIT count annually, at the same time that it does the annual sheltered PIT count. The last official PIT count required by HUD was in January 2015.

2H-1. Did the CoC approve the final unsheltered PIT count methodology for the most recent unsheltered PIT count? Yes

2H-2. Indicate the date of the most recent unsheltered PIT count (mm/dd/yyyy): 01/27/2015

2H-2a. If the CoC conducted the unsheltered PIT count outside of the last 10 days of January 2015, was an exception granted by HUD? Not Applicable

2H-3. Enter the date the CoC submitted the unsheltered PIT count data in HDX (mm/dd/yyyy): 05/14/2015

2I. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Methods

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2I-1. Indicate the methods used to count unsheltered homeless persons during the 2015 PIT count:

Night of the count - complete census:	<input type="checkbox"/>
Night of the count - known locations:	<input checked="" type="checkbox"/>
Night of the count - random sample:	<input type="checkbox"/>
Service-based count:	<input checked="" type="checkbox"/>
HMIS:	<input type="checkbox"/>
	<input type="checkbox"/>

2I-2. Provide a brief description of your CoC's unsheltered PIT count methodology and describe why your CoC selected its unsheltered PIT count methodology. (limit 1000 characters)

There is a PIT committee made up of leads from each of the counties. Some cover more than one county. Volunteers are recruited in all 13 counties within the BOSCoC and were trained both in person and via webinar, to conduct interviews with individuals using the survey tool. Interviewing took place in locations throughout the state during the required time for the point of time count. Places where people were interviewed include feeding sites, known camping sites and still others in alleys, parks, cars, abandoned buildings etc. A series of data points (initials and birth year) were collected to provide an unique identifier but non-identifying information, to ensure non duplication of effort. All survey data was entered into a database and analysed. Surveys of participants who did not meet the definition of homeless were removed from the final count. AZBOSCOC uses this methodology due to the vastness of the area in the COC.

2I-3. Describe any change in methodology from your unsheltered PIT count in 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015, including any change in sampling or extrapolation method, if applicable. Do not include information on changes to implementation of your sheltered PIT count methodology (e.g., enhanced training and change in partners participating in the count). (limit 1000 characters)

N/A

2I-4. Does your CoC plan on conducting an unsheltered PIT count in 2016? Yes

(If "Yes" is selected, HUD expects the CoC to conduct an unsheltered PIT count in 2016. See the FY 2015 CoC Program NOFA, Section VII.A.4.d. for full information.)

2J. Continuum of Care (CoC) Unsheltered Point-in-Time (PIT) Count: Data Quality

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

2J-1. Indicate the steps taken by the CoC to ensure the quality of the data collected for the 2015 unsheltered population PIT count:

Training:	<input checked="" type="checkbox"/>
"Blitz" count:	<input type="checkbox"/>
Unique identifier:	<input checked="" type="checkbox"/>
Survey question:	<input checked="" type="checkbox"/>
Enumerator observation:	<input type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

2J-2. Describe any change to the way the CoC implemented the unsheltered PIT count from 2014 (or 2013 if an unsheltered count was not conducted in 2014) to 2015 that would affect data quality. This includes changes to training volunteers and inclusion of any partner agencies in the unsheltered PIT count planning and implementation, if applicable. Do not include information on changes to actual methodology (e.g., change in sampling or extrapolation method). (limit 1000 characters)

The BOSCO enhanced its utilization of a PIT Count subcommittee with regular meetings and emphasis on ensuring that counts were conducted consistently in each county. Volunteers had the option to attend training locally with the local coordinators who were part of the subcommittee as well as via webinar.

3A. Continuum of Care (CoC) System Performance

Instructions

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

3A-1. Performance Measure: Number of Persons Homeless - Point-in-Time Count.

* 3A-1a. Change in PIT Counts of Sheltered and Unsheltered Homeless Persons

Using the table below, indicate the number of persons who were homeless at a Point-in-Time (PIT) based on the 2014 and 2015 PIT counts as recorded in the Homelessness Data Exchange (HDX).

	2014 PIT (for unsheltered count, most recent year conducted)	2015 PIT	Difference
Universe: Total PIT Count of sheltered and unsheltered persons	2,398	2,402	4
Emergency Shelter Total	1,019	851	-168
Safe Haven Total	0	0	0
Transitional Housing Total	330	246	-84
Total Sheltered Count	1,349	1,097	-252
Total Unsheltered Count	1,049	1,305	256

3A-1b. Number of Sheltered Persons Homeless - HMIS.

Using HMIS data, CoCs must use the table below to indicate the number of homeless persons who were served in a sheltered environment between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Unduplicated Total sheltered homeless persons	3,884
Emergency Shelter Total	3,478
Safe Haven Total	0
Transitional Housing Total	543

3A-2. Performance Measure: First Time Homeless.

**Describe the CoC's efforts to reduce the number of individuals and families who become homeless for the first time. Specifically, describe what the CoC is doing to identify risk factors for becoming homeless for the first time.
(limit 1000 characters)**

The AZBOSCOC provided Diversion Training (mid November 2015) to all agencies that assist those who become homeless to prevent them from entering the shelter system. Agencies are connecting individuals and families to faith based and other not for profit agencies that can assist with immediate housing and stabilization so that the homeless experience is of short duration. It is known that lack of affordable housing is a major risk factor and the state of Arizona Department of Housing is active throughout the state working to fund new affordable housing development through HOME funds to support owner occupied rehab. Reallocated monies are only being used for new RRH and two TH programs are positioning themselves to transition to RRH in 2016. Employment is also a focus. At the statewide conference, there was a session about employment development in rural counties focused on small scale efforts such as self employment and start up businesses in addition to traditional strategies.

3A-3. Performance Measure: Length of Time Homeless.

**Describe the CoC's efforts to reduce the length of time individuals and families remain homeless. Specifically, describe how your CoC has reduced the average length of time homeless, including how the CoC identifies and houses individuals and families with the longest lengths of time homeless.
(limit 1000 characters)**

Identifying individuals and families with the longest lengths of time of experiencing homelessness is done both through Coordinated Entry and the HMIS. The COC is working to develop standardized intake processes, improve case conferencing, maintain quality data collection and measure outcomes. Strong emphasis is placed on getting households the resources they need to find stable living situations. Through this year's application process the COC hopes to increase the amount of RRH available and under the contract. Upon contract renewal, a performance measure about reducing the length of time a household is homeless will be include with the standard set at 10%.

*** 3A-4. Performance Measure: Successful Permanent Housing Placement or Retention.**

In the next two questions, CoCs must indicate the success of its projects in placing persons from its projects into permanent housing.

3A-4a. Exits to Permanent Housing Destinations:

In the chart below, CoCs must indicate the number of persons in CoC funded supportive services only (SSO), transitional housing (TH), and rapid re-housing (RRH) project types who exited into permanent housing destinations between October 1, 2013 and September 30, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in SSO, TH and PH-RRH who exited	159
Of the persons in the Universe above, how many of those exited to permanent destinations?	132
% Successful Exits	83.02%

3A-4b. Exit To or Retention Of Permanent Housing:

In the chart below, CoCs must indicate the number of persons who exited from any CoC funded permanent housing project, except rapid re-housing projects, to permanent housing destinations or retained their permanent housing between October 1, 2013 and September 31, 2014.

	Between October 1, 2013 and September 30, 2014
Universe: Persons in all PH projects except PH-RRH	680
Of the persons in the Universe above, indicate how many of those remained in applicable PH projects and how many of those exited to permanent destinations?	642
% Successful Retentions/Exits	94.41%

3A-5. Performance Measure: Returns to Homelessness:

Describe the CoC's efforts to reduce the rate of individuals and families who return to homelessness. Specifically, describe at least three strategies your CoC has implemented to identify and minimize returns to homelessness, and demonstrate the use of HMIS or a comparable database to monitor and record returns to homelessness. (limit 1000 characters)

The BOSCO began looking at the rate of return to homelessness with the HPRP grant in 2009-2012. We had an HMIS query developed to get a sense of return and 6 months after the program ended, less than 20% of those assisted reappeared in HMIS. All of the COC's efforts are for positive outcomes to prevent and end homelessness for all Arizonans. 1) We perform a desk monitoring each month when Requests for Payments and rent rolls are submitted. 2) We utilize HMIS to verify data and check to see if new households had been elsewhere in the system and 3) we provide ongoing training in case conferencing, diversion and landlord recruitment.

3A-6. Performance Measure: Job and Income Growth.

**Describe specific strategies implemented by CoC Program-funded projects to increase the rate by which homeless individuals and families increase income from employment and non-employment sources (include at least one specific strategy for employment income and one for non-employment related income, and name the organization responsible for carrying out each strategy).
(limit 1000 characters)**

1) Two COC program funded projects have an on-site employment project. In the southern part of the state, there is an Adirondack furniture making program and in addition to learning a variety of skills from making to selling, the tenants are able to save their profits for assisting them when they move from TH to PH. In Yavapai County, there is a commercial kitchen that US Vets, COC programs use to train participants in different areas of food handling. 2) A session was held at the statewide conference focused on employment development in rural areas including small businesses and self employment. 3) SOAR training has been provided throughout the BOSCO. 4) All participants are connected to the Department of Economic Security for application for mainstream resources and connection to employment and vocational rehabilitation support as needed. 5)The RBHAs also have specialized employment support for those persons residing in our programs that have a serious mental illness.

**3A-6a. Describe how the CoC is working with mainstream employment organizations to aid homeless individuals and families in increasing their income.
(limit 1000 characters)**

The BOSCO includes representatives from employment organizations who attend the regional meetings. Individual sub recipients also have relationships with Vocational Rehabilitation, local Private Industry Councils, and other employment organizations. The sub recipients work closely with these partners and support participants in connecting for employment related services. Sub recipient staff assist participants with applications and arrange for transportation when needed.

All sub recipients connect participants with the Department of Economic Security for application for mainstream resources and to connect to employment and vocational rehabilitation services.

The BOSCO supports Project Homeless Connect events throughout BOSCO regions; Goodwill Industries in Coconino County has extensive job connection events

3A-7. Performance Measure: Thoroughness of Outreach.

**How does the CoC ensure that all people living unsheltered in the CoC's geographic area are known to and engaged by providers and outreach teams?
(limit 1000 characters)**

The BOSCO uses several strategies to engage as many persons living unsheltered. 1) PATH outreach is available in four of 13 counties in the COC. 2) The regional behavioral health authorities for COC areas are expanding their crisis response activities which will provide an additional resource to identify individuals. 3) The 13 counties Sheriff's Departments, Border Patrol and Tribal Law Enforcement are key collaborations in identifying persons particularly in isolated and frontier areas of the state. When they encounter those living unsheltered, rides are provided to towns that can provide shelter through faith based agencies in many cases and engagement occurs at that point with referrals to appropriate agencies for further assistance. There will continue to be challenges though as the area is 96,000 square miles with many areas being rugged and difficult to reach.

3A-7a. Did the CoC exclude geographic areas from the 2015 unsheltered PIT count where the CoC determined that there were no unsheltered homeless people, including areas that are uninhabitable (e.g., deserts)? Yes

**3A-7b. What was the the criteria and decision-making process the CoC used to identify and exclude specific geographic areas from the CoC's unsheltered PIT count?
(limit 1000 characters)**

The PIT committee discussed and agreed upon the geographic areas to be covered by the PIT which included everything but the area known as the Arizona Strip, north of the Grand Canyon to the Utah border, west of Tuba City and Page, the Wildlife Refuges, Indian Reservations and most mountain ranges. It did include national parks where camping occurs and areas that are known to the community as "camping" sites including abandoned buildings, dry river beds, etc.

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 1: Ending Chronic Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

Opening Doors, Federal Strategic Plan to Prevent and End Homelessness (as amended in 2015) establishes the national goal of ending chronic homelessness. Although the original goal was to end chronic homelessness by the end of 2015, that goal timeline has been extended to 2017. HUD is hopeful that communities that are participating in the Zero: 2016 technical assistance initiative will continue to be able to reach the goal by the end of 2016. The questions in this section focus on the strategies and resources available within a community to help meet this goal.

3B-1.1. Compare the total number of chronically homeless persons, which includes persons in families, in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered chronically homeless persons	370	542	172
Sheltered Count of chronically homeless persons	191	20	-171
Unsheltered Count of chronically homeless persons	179	522	343

**3B-1.1a. Using the "Differences" calculated in question 3B-1.1 above, explain the reason(s) for any increase, decrease, or no change in the overall TOTAL number of chronically homeless persons in the CoC, as well as the change in the unsheltered count, as reported in the PIT count in 2015 compared to 2014. To possibly receive full credit, both the overall total and unsheltered changes must be addressed.
(limit 1000 characters)**

The increase in persons who are chronically homeless was because of the unsheltered count. The numbers in shelter went down significantly from 2014 to 2015.

We had one county, La Paz which is quite small and has in the past had low unsheltered counts. With assigning coordinators for each county, this result in an unexpectedly high count of individuals, many who had the characteristics of being chronically homeless and also identify themselves as veterans. The BOSCO efforts continue to outreach and work with group to identify needed resources.

One SSVF service provider has expanded their service area to include La Paz County in response to the information collected through the count.

The BOSCO also expanded its coverage of La Paz County through designation of units specifically for the county in the ACHEIVE SPC La Paz and Yuma County project.

3B-1.2. From the FY 2013/FY 2014 CoC Application: Describe the CoC's two year plan (2014-2015) to increase the number of permanent supportive housing beds available for chronically homeless persons and to meet the proposed numeric goals as indicated in the table above. Response should address the specific strategies and actions the CoC will take to achieve the goal of ending chronic homelessness by the end of 2015. (read only)

The BOS COC has adopted a policy of prioritizing those families & individuals experiencing chronically homelessness. Upon turnover in a PSH, those who are chronically homeless, individuals or families, will be housed. Currently under contract are 297 units of PSH in the 13 BOS counties, 88 of them are designated for CH already. The AZ Dept. of Health received a SAMSHA CABHI grant in fall of 2013 to provide intense services to those who are serial inebriates & are chronically homeless. They may also have additional behavioral health & physical health issues. This grant focuses on 2 of the larger BOS counties: Coconino & Yavapai. ADOH & ADBH have an MOU whereby upon turnover all PSH units in these two counties will be used for housing CABHI clients. This year's continuum is using reallocated funds to apply for an additional PSH program to provide housing for CH. VASH units are in 4 BOS counties and SSVF programs are in 11 BOS Counties primarily targeting chronic households.

3B-1.2a. Of the strategies listed in the FY 2013/FY 2014 CoC Application represented in 3B-1.2, which of these strategies and actions were accomplished? (limit 1000 characters)

All of them. The CABHI grant continues to utilize the PSH grant in Yavapai and Coconino counties which prioritizes these referrals based on VI-SPDAT scores and the BOSCO was awarded the PSH program funded with reallocated monies providing housing for CH. VASH and SSVF continue operating and all PSH contracts with sub-recipients state that upon turnover, priority must be given to those who are CH and that turnover and housing is monitored monthly through HMIS, rent rolls and requests for payment.

3B-1.3. Compare the total number of PSH beds (CoC Program and non-CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count, as compared to those identified on the 2014 Housing Inventory Count.

	2014	2015	Difference
Number of CoC Program and non-CoC Program funded PSH beds dedicated for use by chronically homelessness persons identified on the HIC.	158	106	-52

**3B-1.3a. Explain the reason(s) for any increase, decrease or no change in the total number of PSH beds (CoC Program and non CoC Program funded) that were identified as dedicated for use by chronically homeless persons on the 2015 Housing Inventory Count compared to those identified on the 2014 Housing Inventory Count.
(limit 1000 characters)**

In 2014 HH's using VASH that met the definition of chronically homeless were counted as part of the 158. Inadvertently, VASH for chronically homeless veterans was not included in 2015 but upon asking the VA for data there were 58 VASH vouchers in use by HH's meeting the chronic definition for a total of 164 thereby actually increasing the number of beds in use by those who are chronically homeless. The increase is in the COC PSH programs that are prioritizing through coordinated entry those who are chronically homeless and housing those people upon turnover.

3B-1.4. Did the CoC adopt the orders of priority in all CoC Program-funded PSH as described in Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness in Permanent Supportive Housing and Recordkeeping Requirements for Documenting Chronic Homeless Status ?

Yes

3B-1.4a. If "Yes", attach the CoC's written standards that were updated to incorporate the order of priority in Notice CPD-14-012 and indicate the page(s) that contain the CoC's update.

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3B-1.5. CoC Program funded Permanent Supportive Housing Project Beds prioritized for serving people experiencing chronic homelessness in FY2015 operating year.

Percentage of CoC Program funded PSH beds prioritized for chronic homelessness	FY2015 Project Application
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness.	247
Based on all of the renewal project applications for PSH, enter the estimated number of CoC-funded PSH beds in projects being renewed in the FY 2015 CoC Program Competition that are not designated as dedicated beds for persons experiencing chronic homelessness that will be made available through turnover in the FY 2015 operating year.	100
Based on all of the renewal project applications for PSH, enter the estimated number of PSH beds made available through turnover that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	100
This field estimates the percentage of turnover beds that will be prioritized beds for persons experiencing chronic homelessness in the FY 2015 operating year.	100.00%

3B-1.6. Is the CoC on track to meet the goal of ending chronic homelessness by 2017? Yes

This question will not be scored.

3B-1.6a. If “Yes,” what are the strategies implemented by the CoC to maximize current resources to meet this goal? If “No,” what resources or technical assistance will be implemented by the CoC to reach the goal of ending chronically homeless by 2017? (limit 1000 characters)

The BOSCOC has implemented several strategies including: 1) The Arizona Department of Housing contract with sub-recipients requires all PSH beds on turnover be prioritized for persons who are chronically homeless. 2) The BOSCOC Governance Committee required that all bonus projects be dedicated to serve persons who are chronically homeless. 3) The BOSCOC has begun to share data at regional meetings related to the numbers of persons served who are chronically homeless in order to discuss strategies that continue to enhance housing availability for persons who are chronically homeless. 4) At the statewide conference in October there was a unanimous vote of the COC membership to establish data sharing via HMIS throughout the BOSCOC

3B. Continuum of Care (CoC) Strategic Planning Objectives

Objective 2: Ending Homelessness Among Households with Children and Ending Youth Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

Opening Doors outlines the goal of ending family (Households with Children) and youth homelessness by 2020. The following questions focus on the various strategies that will aid communities in meeting this goal.

3B-2.1. What factors will the CoC use to prioritize households with children during the FY2015 Operating year? (Check all that apply).

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Number of previous homeless episodes:	<input checked="" type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Criminal History:	<input checked="" type="checkbox"/>
Bad credit or rental history (including not having been a leaseholder):	<input checked="" type="checkbox"/>
Head of household has mental/physical disabilities:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

**3B-2.2. Describe the CoC's plan to rapidly rehouse every family that becomes homeless within 30 days of becoming homeless on the street or entering shelter.
(limit 1000 characters)**

1) All sub recipients implement Housing First and help families into housing without barriers and preconditions. 2) Coordinated entry is used to identify families that need rapid rehousing options. 3) There are local networks in many of the communities within the BOSCO. Agencies regularly communicate with each other to ensure families are accessing resources needed. 4) Families who participated in being surveyed as part of the unsheltered PIT were provided information how to contact agencies in their community for housing assistance. 5) Families are supported with utility deposits, household items and furniture, access to food to help families be able to settle into housing. 6) Employment support and other resources are provided to help families stabilize their situation in order to not slip back into homelessness. 7) The BOSCO is working with the Arizona Multifamily Association to develop alternatives to eviction of difficult COC participants.

3B-2.3. Compare the number of RRH units available to serve families from the 2014 and 2015 HIC.

	2014	2015	Difference
RRH units available to serve families in the HIC:	6	39	33

3B-2.4. How does the CoC ensure that emergency shelters, transitional housing, and permanent housing (PSH and RRH) providers within the CoC do not deny admission to or separate any family members from other members of their family based on age, sex, or gender when entering shelter or housing? (check all strategies that apply)

CoC policies and procedures prohibit involuntary family separation:	<input type="checkbox"/>
There is a method for clients to alert CoC when involuntarily separated:	<input type="checkbox"/>
CoC holds trainings on preventing involuntary family separation, at least once a year:	<input checked="" type="checkbox"/>
CA monitors TH and PH to ensure families are not separated	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
None:	<input type="checkbox"/>

3B-2.5. Compare the total number of homeless households with children in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

PIT Count of Homelessness Among Households With Children

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT Count of sheltered and unsheltered homeless households with children:	233	202	-31
Sheltered Count of homeless households with children:	182	143	-39
Unsheltered Count of homeless households with children:	51	59	8

3B-2.5a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless households with children in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count. (limit 1000 characters)

There was a decrease in the number of sheltered homeless households with children. Factors that contributed included implementation of Housing First and an increase in the availability of RRH units. There was an increase of 8 households in the unsheltered count from 2013 to 2015. Contributing factors include better weather during 2015 which provided improved ability to count. Counts also took place in all counties in the BOSCO in 2015, also because of improved weather.

3B-2.6. Does the CoC have strategies to address the unique needs of unaccompanied homeless youth (under age 18, and ages 18-24), including the following:

Human trafficking and other forms of exploitation?	No
LGBTQ youth homelessness?	Yes
Exits from foster care into homelessness?	Yes
Family reunification and community engagement?	Yes
Positive Youth Development, Trauma Informed Care, and the use of Risk and Protective Factors in assessing youth housing and service needs?	Yes
Unaccompanied minors/youth below the age of 18?	Yes

3B-2.6a. Select all strategies that the CoC uses to address homeless youth trafficking and other forms of exploitation.

Diversion from institutions and decriminalization of youth actions that stem from being trafficked:	<input type="checkbox"/>
Increase housing and service options for youth fleeing or attempting to flee trafficking:	<input type="checkbox"/>
Specific sampling methodology for enumerating and characterizing local youth trafficking:	<input type="checkbox"/>
Cross systems strategies to quickly identify and prevent occurrences of youth trafficking:	<input type="checkbox"/>
Community awareness training concerning youth trafficking:	<input type="checkbox"/>
The Govs Office held a conference in Nov to open a dialogue about the issue. Efforts were started to identify statewide strategies.	<input checked="" type="checkbox"/>
N/A:	<input type="checkbox"/>

3B-2.7. What factors will the CoC use to prioritize unaccompanied youth (under age 18, and ages 18-24) for housing and services during the FY2015 operating year? (Check all that apply)

Vulnerability to victimization:	<input checked="" type="checkbox"/>
Length of time homeless:	<input checked="" type="checkbox"/>
Unsheltered homelessness:	<input checked="" type="checkbox"/>
Lack of access to family and community support networks:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
N/A:	<input type="checkbox"/>

3B-2.8. Using HMIS, compare all unaccompanied youth (under age 18, and ages 18-24) served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2013 (October 1, 2012 - September 30, 2013) and FY 2014 (October 1, 2013 - September 30, 2014).

	FY 2013 (October 1, 2012 - September 30, 2013)	FY 2014 (October 1, 2013 - September 30, 2014)	Difference
Total number of unaccompanied youth served in HMIS contributing programs who were in an unsheltered situation prior to entry:	77	90	13

**3B-2.8a. If the number of unaccompanied youth and children, and youth-headed households with children served in any HMIS contributing program who were in an unsheltered situation prior to entry in FY 2014 is lower than FY 2013, explain why.
(limit 1000 characters)**

Not applicable

3B-2.9. Compare funding for youth homelessness in the CoC's geographic area in CY 2015 to projected funding for CY 2016.

	Calendar Year 2015	Calendar Year 2016	Difference
Overall funding for youth homelessness dedicated projects (CoC Program and non-CoC Program funded):	\$0.00	\$0.00	\$0.00
CoC Program funding for youth homelessness dedicated projects:	\$0.00	\$0.00	\$0.00
Non-CoC funding for youth homelessness dedicated projects (e.g. RHY or other Federal, State and Local funding):	\$0.00	\$0.00	\$0.00

3B-2.10. To what extent have youth housing and service providers and/or State or Local educational representatives, and CoC representatives participated in each other's meetings over the past 12 months?

Cross-Participation in Meetings	# Times
CoC meetings or planning events attended by LEA or SEA representatives:	4
LEA or SEA meetings or planning events (e.g. those about child welfare, juvenile justice or out of school time) attended by CoC representatives:	1
CoC meetings or planning events attended by youth housing and service providers (e.g. RHY providers):	2

**3B-2.10a. Given the responses in 3B-2.10, describe in detail how the CoC collaborates with the McKinney-Vento local education liaisons and State educational coordinators.
(limit 1000 characters)**

The State Coordinator for Homeless Education forwards the BOSCO Regional meeting notices to all liaisons, however, many of those positions are held by people unable to come to a COC meeting held from 9-noon. We have some liaisons funded with McKinney Vento monies and they attend as they are more involved in working with families and in collaboration with COC agencies. The State Coordinator also presents once a year at a round of regional meetings so that all are aware of the laws and funding around this issue. All COC funded agencies know who the liaisons are in each school district covered by their programs and outreach from COC funded agencies to school liaisons is very good. In addition, each sub recipient who serves families has an identified staff person the coordinates with school districts.

3B-2.11. How does the CoC make sure that homeless participants are informed of their eligibility for and receive access to educational services? Include the policies and procedures that homeless service providers (CoC and ESG Programs) are required to follow. In addition, include how the CoC, together with its youth and educational partners (e.g. RHY, schools, juvenile justice and children welfare agencies), identifies participants who are eligible for CoC or ESG programs. (limit 2000 characters)

Each sub recipient who serves families has an identified staff person the works with families and coordinates with school districts. Although not a formal policy, the issue of coordination about educational services is discussed at regional and local meetings. The BOSCO has not heard of any issues related to participants accessing educational services. In addition, as indicated by the 2015 PIT, 93% were households without children.

Sub recipient staff and youth serving organizations in the individual communities coordinate activities to ensure that participants are provided referrals to COC or ESG programs.

3B. Continuum of Care (CoC) Performance and Strategic Planning Objectives

Objective 3: Ending Veterans Homelessness

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

Opening Doors outlines the goal of ending Veteran homelessness by the end of 2015. The following questions focus on the various strategies that will aid communities in meeting this goal.

3B-3.1. Compare the total number of homeless Veterans in the CoC as reported by the CoC for the 2015 PIT count compared to 2014 (or 2013 if an unsheltered count was not conducted in 2014).

	2014 (for unsheltered count, most recent year conducted)	2015	Difference
Universe: Total PIT count of sheltered and unsheltered homeless veterans:	263	516	253
Sheltered count of homeless veterans:	138	107	-31
Unsheltered count of homeless veterans:	125	409	284

**3B-3.1a. Explain the reason(s) for any increase, decrease or no change in the total number of homeless veterans in the CoC as reported in the 2015 PIT count compared to the 2014 PIT count.
(limit 1000 characters)**

The unsheltered count increased due to an unexpected large count in a small rural county—La Paz. To address this increase, one SSVF program is expanding services into La Paz. In addition the BOSCOCC dedicated units in the ACHIEVE SPC La Paz and Yuma project to specifically be used in La Paz. The BOSCOCC has enhanced collaboration with veteran focused agencies. These agencies participated in the PIT. As a result there was increased outreach to veterans. This resulted in the unexpected increase in persons counted in La Paz with the vast majority of those being veterans.

There has been a decrease in the number of veterans in shelter and TH because of the increase in PH, VASH, and SSVF options available in the state. As an example 24 SSVF RRH beds were reported in the HIC in 2014. In 2015 SSVF-RRH beds counted in the HIC increased to 176, providing additional opportunities for veterans to be housed. The BOSCOCC has also designated veterans as a priority when vacancies occur.

**3B-3.2. How is the CoC ensuring that Veterans that are eligible for VA services are identified, assessed and referred to appropriate resources, i.e. HUD-VASH and SSVF?
(limit 1000 characters)**

The BOSCOCC coordinates with Stand Downs that occur. In 2015 there were eight Stand Downs in communities within the BOSCOCC. Sub recipients participate in these events in addition to other community agencies to help veterans access resources. In addition, the BOSCOCC initiated a subcommittee during 2015 composed of VA serving agencies in the geographic area. The BOSCOCC initiated TA efforts through Vets@Home. Two meetings took place in November 2015 as a result with additional meetings scheduled in January. The BOSCOCC and its sub recipients as well as SSVF providers are participating in these sessions to develop strategies for closer coordination. Other forms of outreach utilized, in addition to PATH Teams includes: print media, websites, and referrals between agencies.

**3B-3.3. For Veterans who are not eligible for homeless assistance through the U.S Department of Veterans Affairs Programs, how is the CoC prioritizing CoC Program-funded resources to serve this population?
(limit 1000 characters)**

The first priority on turnover in PH programs is those who are chronically homeless and the second priority are those who are veterans. However, turnover rates are not high and a disability is required for all but the few RRH programs in the BOS. The BOSCOCC does have three renewal programs dedicated to housing veterans (both TH and PSH). In addition, one of the bonus projects proposed for funding is a RRH project dedicated to serving veterans. Enhancing the coordination efforts between the BOSCOCC and veteran serving agencies was also a key point for the TA through VETS@Home. The first of the TA meetings took place in November and a second cycle is scheduled for January 2016.

3B-3.4. Compare the total number of homeless Veterans in the CoC AND the total number of unsheltered homeless Veterans in the CoC, as reported by the CoC for the 2015 PIT Count compared to the 2010 PIT Count (or 2009 if an unsheltered count was not conducted in 2010).

	2010 (or 2009 if an unsheltered count was not conducted in 2010)	2015	% Difference
Total PIT count of sheltered and unsheltered homeless veterans:	230	516	124.35%
Unsheltered count of homeless veterans:	117	409	249.57%

3B-3.5. Indicate from the dropdown whether you are on target to end Veteran homelessness by the end of 2015. No

This question will not be scored.

3B-3.5a. If “Yes,” what are the strategies being used to maximize your current resources to meet this goal? If “No,” what resources or technical assistance would help you reach the goal of ending Veteran homelessness by the end of 2015? (limit 1000 characters)

We received notice in October that the request for Vets@Home TA was granted. The BOSCO C formed a Veterans Committee in July and that committee meets bi-monthly via teleconference. The Vets@Home TA began with a teleconference call with the Veterans Committee on October 29, 2015 and two onsite visits have occurred; November 9th in Prescott and November 10th in Tucson with all veterans' organizations being represented including both the NAVAHCS and SAVAHCS. Out of these meetings came a vision and an agreement to create a by-name list. Case conferencing already occurs and will be enhanced with increased knowledge and action items coming from the Vets@Home TA. The BOSCO C will be including the VI-SPDAT during the unsheltered PIT the last week of January 2016. An analysis of the Veteran AHAR along with the PIT, increased meetings and continued TA is expected to give the BOSCO C the surge needed to achieve this goal in 2016.

4A. Accessing Mainstream Benefits

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

4A-1. Does the CoC systematically provide information to provider staff about mainstream benefits, including up-to-date resources on eligibility and mainstream program changes that can affect homeless clients? Yes

4A-2. Based on the CoC's FY 2015 new and renewal project applications, what percentage of projects have demonstrated that the project is assisting project participants to obtain mainstream benefits, which includes all of the following within each project: transportation assistance, use of a single application, annual follow-ups with participants, and SOAR-trained staff technical assistance to obtain SSI/SSDI?

FY 2015 Assistance with Mainstream Benefits

Total number of project applications in the FY 2015 competition (new and renewal):	29
Total number of renewal and new project applications that demonstrate assistance to project participants to obtain mainstream benefits (i.e. In a Renewal Project Application, "Yes" is selected for Questions 3a, 3b, 3c, 4, and 4a on Screen 4A. In a New Project Application, "Yes" is selected for Questions 5a, 5b, 5c, 6, and 6a on Screen 4A).	29
Percentage of renewal and new project applications in the FY 2015 competition that have demonstrated assistance to project participants to obtain mainstream benefits:	100%

4A-3. List the healthcare organizations you are collaborating with to facilitate health insurance enrollment (e.g. Medicaid, Affordable Care Act options) for program participants. For each healthcare partner, detail the specific outcomes resulting from the partnership in the establishment of benefits for program participants. (limit 1000 characters)

The Arizona Health Care Cost Containment System(AHCCCS), Arizona's Medicaid program, & Arizona Department of Economic Security have developed Health-e-Arizona Plus, an accessible on-line system to connect individuals & families to health coverage, benefits & services including helping people connect to the Federal Insurance Market Place, to help low income Arizonans with the cost of health insurance. Staff is available to help people navigate the system to obtain benefits.

On 10-01-2015 the Arizona Department of Health Services enacted a system transformation by contracting with two new Regional Behavioral Health Authorities covering the BOS. Both offer integrated physical & behavioral health services to those with a serious mental illness. To accurately facilitate SMI determinations for high risk populations including those who are chronically homeless, ADHS also transitioned the determination process to Crisis Response Network who has been successful in AZ502 for the past year.

4A-4. What are the primary ways that the CoC ensures that program participants with health insurance are able to effectively utilize the healthcare benefits available?

Educational materials:	<input checked="" type="checkbox"/>
In-Person Trainings:	<input checked="" type="checkbox"/>
Transportation to medical appointments:	<input checked="" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Not Applicable or None:	<input type="checkbox"/>

4B. Additional Policies

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

4B-1. Based on the CoC's FY 2015 new and renewal project applications, what percentage of Permanent Housing (PSH and RRH), Transitional Housing (TH) and SSO (non-Coordinated Entry) projects in the CoC are low barrier? Meaning that they do not screen out potential participants based on those clients possessing a) too little or little income, b) active or history of substance use, c) criminal record, with exceptions for state-mandated restrictions, and d) history of domestic violence.

FY 2015 Low Barrier Designation

Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO project applications in the FY 2015 competition (new and renewal):	29
Total number of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications that selected "low barrier" in the FY 2015 competition:	29
Percentage of PH (PSH and RRH), TH and non-Coordinated Entry SSO renewal and new project applications in the FY 2015 competition that will be designated as "low barrier":	100%

4B-2. What percentage of CoC Program-funded Permanent Supportive Housing (PSH), RRH, SSO (non-Coordinated Entry) and Transitional Housing (TH) FY 2015 Projects have adopted a Housing First approach, meaning that the project quickly houses clients without preconditions or service participation requirements?

FY 2015 Projects Housing First Designation

Total number of PSH, RRH, non-Coordinated Entry SSO, and TH project applications in the FY 2015 competition (new and renewal):	29
Total number of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications that selected Housing First in the FY 2015 competition:	29
Percentage of PSH, RRH, non-Coordinated Entry SSO, and TH renewal and new project applications in the FY 2015 competition that will be designated as Housing First:	100%

4B-3. What has the CoC done to ensure awareness of and access to housing and supportive services within the CoC's geographic area to persons that could benefit from CoC-funded programs but are not currently participating in a CoC funded program? In particular, how does the CoC reach out to for persons that are least likely to request housing or services in the absence of special outreach?

Direct outreach and marketing:	<input checked="checked" type="checkbox"/>
Use of phone or internet-based services like 211:	<input checked="checked" type="checkbox"/>
Marketing in languages commonly spoken in the community:	<input checked="checked" type="checkbox"/>
Making physical and virtual locations accessible to those with disabilities:	<input checked="checked" type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
	<input type="checkbox"/>
Not applicable:	<input type="checkbox"/>

4B-4. Compare the number of RRH units available to serve any population from the 2014 and 2015 HIC.

	2014	2015	Difference
RRH units available to serve any population in the HIC:	12	85	73

4B-5. Are any new proposed project applications requesting \$200,000 or more in funding for housing rehabilitation or new construction? No

**4B-6. If "Yes" in Questions 4B-5, then describe the activities that the project(s) will undertake to ensure that employment, training and other economic opportunities are directed to low or very low income persons to comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) (Section 3) and HUD's implementing rules at 24 CFR part 135?
 (limit 1000 characters)**

N/A

4B-7. Is the CoC requesting to designate one or more of its SSO or TH projects to serve families with children and youth defined as homeless under other Federal statutes?

No

4B-7a. If "Yes" in Question 4B-7, describe how the use of grant funds to serve such persons is of equal or greater priority than serving persons defined as homeless in accordance with 24 CFR 578.89. Description must include whether or not this is listed as a priority in the Consolidated Plan(s) and its CoC strategic plan goals. CoCs must attach the list of projects that would be serving this population (up to 10 percent of CoC total award) and the applicable portions of the Consolidated Plan. (limit 2500 characters)

N/A

4B-8. Has the project been affected by a major disaster, as declared by President Obama under Title IV of the Robert T. Stafford Act in the 12 months prior to the opening of the FY 2015 CoC Program Competition?

No

4B-8a. If "Yes" in Question 4B-8, describe the impact of the natural disaster on specific projects in the CoC and how this affected the CoC's ability to address homelessness and provide the necessary reporting to HUD. (limit 1500 characters)

N/A

4B-9. Did the CoC or any of its CoC program recipients/subrecipients request technical assistance from HUD in the past two years (since the submission of the FY 2012 application)? This response does not affect the scoring of this application.

Yes

4B-9a. If "Yes" to Question 4B-9, check the box(es) for which technical assistance was requested.

This response does not affect the scoring of this application.

CoC Governance:	<input checked="" type="checkbox"/>
CoC Systems Performance Measurement:	<input checked="" type="checkbox"/>
Coordinated Entry:	<input checked="" type="checkbox"/>
Data reporting and data analysis:	<input type="checkbox"/>
HMIS:	<input checked="" type="checkbox"/>
Homeless subpopulations targeted by Opening Doors: veterans, chronic, children and families, and unaccompanied youth:	<input checked="" type="checkbox"/>
Maximizing the use of mainstream resources:	<input type="checkbox"/>
Retooling transitional housing:	<input type="checkbox"/>
Rapid re-housing:	<input type="checkbox"/>
Under-performing program recipient, subrecipient or project:	<input type="checkbox"/>
	<input type="checkbox"/>
Not applicable:	<input type="checkbox"/>

4B-9b. If TA was received, indicate the type(s) of TA received, using the categories listed in 4B-9a, the month and year it was received and then indicate the value of the TA to the CoC/recipient/subrecipient involved given the local conditions at the time, with 5 being the highest value and a 1 indicating no value.

This response does not affect the scoring of this application.

Type of Technical Assistance Received	Date Received	Rate the Value of the Technical Assistance
COC Governance and Systems Performance Measurement	10/07/2015	5
Homeless Sub Populations-Veterans	11/10/2015	5
Coordinated Entry	03/31/2014	5
HMIS	12/02/2014	5

4C. Attachments

Instructions:

For guidance on completing this form, please reference the FY 2015 CoC Application Detailed Instructions, the CoC Application Instructional Guides and the FY 2015 CoC Program NOFA. Please submit technical questions to the HUDEXchange Ask A Question.

For required attachments related to rejected projects, if the CoC did not reject any projects then attach a document that says "Does Not Apply".

Document Type	Required?	Document Description	Date Attached
01. 2015 CoC Consolidated Application: Evidence of the CoC's Communication to Rejected Projects	Yes	2015 COC Evidence...	11/18/2015
02. 2015 CoC Consolidated Application: Public Posting Evidence	Yes		
03. CoC Rating and Review Procedure	Yes	BOSCOC Rating and...	11/17/2015
04. CoC's Rating and Review Procedure: Public Posting Evidence	Yes		
05. CoCs Process for Reallocating	Yes	BOSCOC Reallocati...	11/17/2015
06. CoC's Governance Charter	Yes	AZBOSCOC Governan...	11/13/2015
07. HMIS Policy and Procedures Manual	Yes	BOSCOC HMIS Polic...	11/17/2015
08. Applicable Sections of Con Plan to Serving Persons Defined as Homeless Under Other Fed Statutes	No		
09. PHA Administration Plan (Applicable Section(s) Only)	Yes	PHA Administratio...	11/13/2015
10. CoC-HMIS MOU (if referenced in the CoC's Governance Charter)	No		
11. CoC Written Standards for Order of Priority	No	ADOH Special Need...	11/13/2015
12. Project List to Serve Persons Defined as Homeless under Other Federal Statutes	No		
13. Other	No		
14. Other	No		
15. Other	No		

Attachment Details

Document Description: 2015 COC Evidence of COC communication to rejected projects

Attachment Details

Document Description:

Attachment Details

Document Description: BOSCOG Rating and Review Procedure

Attachment Details

Document Description:

Attachment Details

Document Description: BOSCOG Reallocation Process 2015

Attachment Details

Document Description: AZBOSCOG Governance Charter

Attachment Details

Document Description: BOSCOH HMIS Policies and Procedures

Attachment Details

Document Description:

Attachment Details

Document Description: PHA Administration Plan Documentation

Attachment Details

Document Description:

Attachment Details

Document Description: ADOH Special Needs Housing Manual

Attachment Details

Document Description:

Attachment Details

Document Description: GIW AZ-500 Final 2015

Attachment Details

Document Description:

Attachment Details

Document Description:

Submission Summary

Page	Last Updated
1A. Identification	11/13/2015
1B. CoC Engagement	11/18/2015
1C. Coordination	11/18/2015
1D. CoC Discharge Planning	11/13/2015
1E. Coordinated Assessment	11/18/2015
1F. Project Review	11/13/2015
1G. Addressing Project Capacity	11/13/2015
2A. HMIS Implementation	11/13/2015
2B. HMIS Funding Sources	11/13/2015
2C. HMIS Beds	11/13/2015
2D. HMIS Data Quality	11/13/2015
2E. Sheltered PIT	11/13/2015
2F. Sheltered Data - Methods	11/13/2015
2G. Sheltered Data - Quality	11/13/2015
2H. Unsheltered PIT	11/13/2015
2I. Unsheltered Data - Methods	11/13/2015
2J. Unsheltered Data - Quality	11/13/2015
3A. System Performance	11/18/2015
3B. Objective 1	11/18/2015
3B. Objective 2	11/18/2015
3B. Objective 3	11/18/2015
4A. Benefits	11/13/2015
4B. Additional Policies	11/13/2015
4C. Attachments	Please Complete
Submission Summary	No Input Required

2015--AZ BOSCOB

Evidence of the COCs Communication

To Rejected Projects

Not applicable

From: Karia Basta <karia.basta@azhousing.gov>
Sent: Thursday, November 05, 2015 4:25 PM
To: Pam Pierce; Barbara Blythe; Carol Carr; Carole Benedict; Cindy Furrh; Clemencia Cardenas; Dave Wolf; Devonna McLaughlin; Floyd Nelson ; Jordan Layton ; Marilyn Johnson; Mary Lou Rosales ; Megan Lee ; Mike Hutchison ; Sandra Flores; Skye Biasetti; Timothy Abraham; Adriana Medrano; Alan Wentz; Albert Moreno ; Alex Taft; Alfred Edwards; Allison Torres; Alyssa Muir; Amanda Frank; Amanda LaPage; Andrea Plischke ; Angela Scala; Angie Saucedo ; Anita Baca ; Anna Weidler; Antoinette Flores; Archie Mariano; Barbara Mikkelsen ; Barbara Montrose; Bekki Dupras; Bill Peck; Brad Roland; Brandon Rawls; Brent Pullin; Brooke Nowak; Cambi Figueroa; Camie Rasband ; Candace Morales ; Candee Stanton ; Carmen Gontes ; Carrie Kray; Catherine Rea; Cathy Peterson ; Cecile Mitchell; Cecilia Brown ; Chantel Padilla ; Cherise Merrick; Cheryl Debatt; Chris Glade; Chris Taylor; Chris Youmatzo; Christina Pflaiderer; Chuck Arabas; Cindy Flores; Coral Hanson ; Cristina Benitez; Cristy Crow; Crystal Connors; Crystal Gottberg ; D.L. Wilson; Danelle Valenzuela; Daniel Gallihugh; Daniel Mattson; David Griffin; David Gutshall; David Hirsch; David Pete; Dazhoni James; Denise Garcia; Denise Perez; Devonna McLaughlin; Dianna Guerrero; dleaman@co.greenlee.az.us; Donna Hauser; Donna Vary ; Dorine Prine; Ed Bylotas ; Eddy O'Brien ; Edward Shier; Eleana Briceland ; Elisa Velasco; Eliza Loudon; Elizabeth Lees; Ella L. Mercer; Eric Weeks; Erica Aguirre; Eva Mendez-Counts; Fran Plakstis; Frances Villa; Francis Susunkewa; Frank Real; Frank Reaser ; Gabriel Vallejo; Gallegos, Norma; Gerald Mann ; Gerry Garvey ; Gina Whittington ; Gordon Block; Greg Billi; Greg Hartz; Greg St. Hilaire; Gregg Martinez ; Gwen Calhoun ; Heidi Hernandez ; Hilda Morales ; Irasema Olvera ; Jack Callaghan ; Jackie Nairn; James Barney ; James R. Latimer; Janet Conchy; Janet Pool; Janice Poma; Jay Gates; Jayne Klages; Jeanette Guerrero; Jeanne Baker; Jenifer Thornton; Jennifer Blomquist; Jennifer Burch; Jennifer Vaughan; Jennifer Vokins; Jenny McLellan; Jill Dyer; Joan Serviss ; Joann Hatton; Joann Reyes; Jodi Teague; John Espinosa; John Motowski; Joyce Lucero; Julia De Los Reyes; Julie Brady ; Julie Montoya; Julie Packer; Julieta Van Horn; Justin Chavez; Karla K. Weir; Katherine Scholz; Kathleen Tittle; Kathy Bishop; Kathy Calabrese ; Kathy Grimes; Keli Sine-Shields ; Kelli Donley; Kelly Tanner ; Ken Repkie; kpowell@azdes.gov; Kristy Reynolds; Krystal Semmons; Laura Elena Gastelum; Laura Mendoza ; Laura Salamone; Lauren Romano; Laurie DiLorenzo; Leah Bloom; Lee Everest ; Leon Lead; Linda Jansen; Linda Northcutt; Linda Stephenson; Liz Gorski; Liz Latham; Lucia Matthews; Lucy Garza ; Lucy Hatathli-Nez ; Luis Heredia; Luisa Williams; Lynda Brophy ; Malinda Benedetto; Malissa Buzan; Manuela Bowler; Maria Chavoya; Maria Escarcega; Maria Moreno; Maria Morones; Mariah Peters; Maribel Najar; Marie Giles ; Mariela Maldonado; Marilyn Williams; Marjorie Keeto-Paxson ; Mark Lewis; Mary Contreras ; Mary Hochstetter ; Mary Lubey; Matrese Avila; Maxine Howington ; Melanie Windecker; Melinda Castillo ; Melissa Hill; Melody Judd ; Michael Ables; Michael Eigenbrodt ; Michael O'Donnell; Michael Oviatt; Michael Pierce; Michael Vetter ; Michell Bailey; Michelle Schreiber; Michelle Thomas; Miguel Villalpando; Mike Breedlove; Mike McClure; Myra Garlit; Nanci Stone; Nick Wood; Nora Yackley; Olga Delsi ; Pamela Moore (pmoore@cbridges.com); Patricia Aldridge; Patricia Campos; Patricia Griffen ; Patricia Nix; Patti Scott-Lopez; Patty Kelly; Pearl Bruno; Rafael Jubera; Rebecca Duckworth; Rhonda Austin; Richard Guinn; Richard Marten; Richard Parker; Rick Steel; Roberta Howard; Robin Weber ; Rochelle Neff; Romelia Lopez ; Ronda Sharp ; Rose Roy; Ross Altenbaugh; Ryan Louis; Sam McIntosh; Sandra Angelo; Sandra Crow; Sandra Ortiz; Sandra Thompson; Sarah Darr; Sarah Roluffs; Scott McDowell; Shaleen Seward; Shannon Braman; Shantae Smith; Sharon Thompson ; Shelley Narmi; Sheria Liles ; Sissy Stephens; Sonia Lopez; Sonnette Chaput ; Stephanie Boardman ; Stephanie

To: Jenkins ; Stephanie Knox; Steven Nath; Susan Richards; Suzanne Payan; Sydney Axt; Sylvia Dawavendewa; Sylvia Rodriguez; T. J. Howard ; Tamara Sandbank ; Teresa Cavendish; Teresa Walsh; Terri Doan; Thelia Robinson; Tiffany Booth; Tolanda Barnes; Tom Isakson; Toni Alvillar; Tony Bedolla; Tony Brackett; Tricia Cano; Tricia Goffene-Beyer ; Ty Yazzie; Valarie Donnelly; Veronica Chavez ; William Evans; William Houdek; William Rhoades; Xenia Gonzalez ; Yvette Ramirez ; Yvonne Taylor

Cc: Joy Johnson; candee.stanton@gmail.com; Karia Basta; Andrew Rael

Subject: Notice of Acceptance for 2015 NOFA

Attachments: Notice of Acceptance.pdf

Importance: High

We are pleased to announce that all renewals were accepted for submittal under the 2015 HUD Continuum of Care Notice of Funding Availability. They have not been prioritized into Tier One and Two at this time.

We are also pleased to announce that Mohave County Community Services and US Vets proposal for a new permanent supportive housing program and a new Rapid Rehousing Program respectively, applied for under the Bonus RFP, will be submitted as well. **Thank you to every agency that applied!** Competition makes us stronger and better!

Peace & Justice,

Karia Lee Basta

Special Needs Program Administrator



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October 2015
Arizona Department of Housing
Balance of State Continuum of Care (BOSCOC)
Renewal Project Process for Review and Ranking

The following is the process used by the AZBOSCOC for the Review and Ranking of renewal applications in 2015:

- BOSCOC Governance Committee reviewed and accepted ranking criteria for renewal applications.
- Renewal applications are scored based on the following information: the APR, information provided by sub-recipients as part of a local questionnaire, and information from ADOH contract monitoring activities. (Specific Criteria is attached and is posted at the ADOH website).
- Renewal applications are scored based on the criteria and ranked based upon score.

**Evaluation Criteria – AZ-500 BOS COC NOFA
Renewal Projects
FY 15/16**

TH—Transitional Housing

PH—Permanent Housing

RRH-Rapid Rehousing (scored as a PH project)

The following is the overview about how renewal projects will be scored to establish the required ranking. Data for scoring comes directly from the most recent APR, the monitoring visits completed by Arizona Department of Housing, VI SPDAT Coordinated Entry Participation, and information provided in the local application. In cases where projects have been combined, the information from the APR will also be combined.

Current Criteria	Measurement	Notes
1. TH-65% of participants move from TH to PH	Program met or exceeded criteria 8-Exceed 5-Met 0-Not Met	APR
2. PH—80% of participants stay housed at least 6 months	Program met or exceeded criteria 8-Exceed 5-Met 0-Not Met	APR
3 TH and PH Employed at exit 20% or more (taxable income)	Program met or exceeded criteria 8-Exceed 5-Met 0-Not Met	APR
4. 20% increase in income at exit regardless of source	Program met or exceeded criteria 8-Exceed 5-Met 0-Not Met	APR
5. % of Contracted Units occupied during the past year	8- 110% and above- 7- 101-110%- 6 - 90-100%- 5 - 80-90% 0 - Less than 80%	HIC
6. 90% Spend Rate Last Contract	96% or above -2 90-95%-1 89% and below-0	ADOH
7. HMIS Bed Participation	2 - 100% 1 - A 0 - Otherwise	APR
8. APR submitted correctly and on time (60 days after end of contract)	1 - Submitted on time and correct 0 - Not submitted on time	ADOH
9. Request for Payment Submitted on Time (submitted in following month for previous month's activity)	90%-100%-2 80%-89%-1 79% and below-0	ADOH

Current Criteria	Measurement	Notes
10. Participation in Regional BOS Meetings as required by contract as documented by sign in sheets	4 mtgs attended-2 3 mtgs attended-1 Less than three-0	Sign In Sheets
11. Active participation in PIT unsheltered count (includes coordination, surveying, recruiting volunteers, logistics, etc.)	2-participation 0-no participation	ADOH
12. Participation in COC at least one sub-committee during program year	2-yes 0-no	ADOH
13. VI-SPDAT coordinated entry has been utilized (Both entering and housing people)	3-yes on both 1- for entering only 0-no	ADOH
16. 30% or more of stayers has one or more sources of main stream resources	2-yes 0-no	APR
17. Agency has established a Housing First philosophy.	3-yes 0-no	ADOH/Local Questionnaire

From: Karia Basta <karia.basta@azhousing.gov>
Sent: Thursday, November 05, 2015 4:25 PM
To: Pam Pierce; Barbara Blythe; Carol Carr; Carole Benedict; Cindy Furrh; Clemencia Cardenas; Dave Wolf; Devonna McLaughlin; Floyd Nelson ; Jordan Layton ; Marilyn Johnson; Mary Lou Rosales ; Megan Lee ; Mike Hutchison ; Sandra Flores; Skye Biasetti; Timothy Abraham; Adriana Medrano; Alan Wentz; Albert Moreno ; Alex Taft; Alfred Edwards; Allison Torres; Alyssa Muir; Amanda Frank; Amanda LaPage; Andrea Plischke ; Angela Scala; Angie Saucedo ; Anita Baca ; Anna Weidler; Antoinette Flores; Archie Mariano; Barbara Mikkelsen ; Barbara Montrose; Bekki Dupras; Bill Peck; Brad Roland; Brandon Rawls; Brent Pullin; Brooke Nowak; Cambi Figueroa; Camie Rasband ; Candace Morales ; Candee Stanton ; Carmen Gontes ; Carrie Kray; Catherine Rea; Cathy Peterson ; Cecile Mitchell; Cecilia Brown ; Chantel Padilla ; Cherise Merrick; Cheryl Debatt; Chris Glade; Chris Taylor; Chris Youmatzo; Christina Pfleiderer; Chuck Arabas; Cindy Flores; Coral Hanson ; Cristina Benitez; Cristy Crow; Crystal Connors; Crystal Gottberg ; D.L. Wilson; Danelle Valenzuela; Daniel Gallihugh; Daniel Mattson; David Griffin; David Gutshall; David Hirsch; David Pete; Dazhoni James; Denise Garcia; Denise Perez; Devonna McLaughlin; Dianna Guerrero; dleaman@co.greenlee.az.us; Donna Hauser; Donna Vary ; Dorine Prine; Ed Bylotas ; Eddy O'Brien ; Edward Shier; Eleana Briceland ; Elisa Velasco; Eliza Loudon; Elizabeth Lees; Ella L. Mercer; Eric Weeks; Erica Aguirre; Eva Mendez-Counts; Fran Plakstis; Frances Villa; Francis Susunkewa; Frank Real; Frank Reaser ; Gabriel Vallejo; Gallegos, Norma; Gerald Mann ; Gerry Garvey ; Gina Whittington ; Gordon Block; Greg Billi; Greg Hartz; Greg St. Hilaire; Gregg Martinez ; Gwen Calhoun ; Heidi Hernandez ; Hilda Morales ; Irasema Olvera ; Jack Callaghan ; Jackie Nairn; James Barney ; James R. Latimer; Janet Conchy; Janet Pool; Janice Poma; Jay Gates; Jayne Klages; Jeanette Guerrero; Jeanne Baker; Jenifer Thornton; Jennifer Blomquist; Jennifer Burch; Jennifer Vaughan; Jennifer Vokins; Jenny McLellan; Jill Dyer; Joan Serviss ; Joann Hatton; Joann Reyes; Jodi Teague; John Espinosa; John Motowski; Joyce Lucero; Julia De Los Reyes; Julie Brady ; Julie Montoya; Julie Packer; Julieta Van Horn; Justin Chavez; Karla K. Weir; Katherine Scholz; Kathleen Tittle; Kathy Bishop; Kathy Calabrese ; Kathy Grimes; Keli Sine-Shields ; Kelli Donley; Kelly Tanner ; Ken Repkie; kpowell@azdes.gov; Kristy Reynolds; Krystal Semmons; Laura Elena Gastelum; Laura Mendoza ; Laura Salamone; Lauren Romano; Laurie DiLorenzo; Leah Bloom; Lee Everest ; Leon Lead; Linda Jansen; Linda Northcutt; Linda Stephenson; Liz Gorski; Liz Latham; Lucia Matthews; Lucy Garza ; Lucy Hatathli-Nez ; Luis Heredia; Luisa Williams; Lynda Brophy ; Malinda Benedetto; Malissa Buzan; Manuela Bowler; Maria Chavoya; Maria Escarcega; Maria Moreno; Maria Morones; Mariah Peters; Maribel Najar; Marie Giles ; Mariela Maldonado; Marilyn Williams; Marjorie Keeto-Paxson ; Mark Lewis; Mary Contreras ; Mary Hochstetter ; Mary Lubey; Matrese Avila; Maxine Howington ; Melanie Windecker; Melinda Castillo ; Melissa Hill; Melody Judd ; Michael Ables; Michael Eigenbrodt ; Michael O'Donnell; Michael Oviatt; Michael Pierce; Michael Vetter ; Michell Bailey; Michelle Schreiber; Michelle Thomas; Miguel Villalpando; Mike Breedlove; Mike McClure; Myra Garlit; Nanci Stone; Nick Wood; Nora Yackley; Olga Delsi ; Pamela Moore (pmoore@cbridges.com); Patricia Aldridge; Patricia Campos; Patricia Griffen ; Patricia Nix; Patti Scott-Lopez; Patty Kelly; Pearl Bruno; Rafael Jubera; Rebecca Duckworth; Rhonda Austin; Richard Guinn; Richard Marten; Richard Parker; Rick Steel; Roberta Howard; Robin Weber ; Rochelle Neff; Romelia Lopez ; Ronda Sharp ; Rose Roy; Ross Altenbaugh; Ryan Louis; Sam McIntosh; Sandra Angelo; Sandra Crow; Sandra Ortiz; Sandra Thompson; Sarah Darr; Sarah Roluffs; Scott McDowell; Shaleen Seward; Shannon Braman; Shantae Smith; Sharon Thompson ; Shelley Narmi; Sheria Liles ; Sissy Stephens; Sonia Lopez; Sonnette Chaput ; Stephanie Boardman ; Stephanie

To: Jenkins ; Stephanie Knox; Steven Nath; Susan Richards; Suzanne Payan; Sydney Axt; Sylvia Dawavendewa; Sylvia Rodriguez; T. J. Howard ; Tamara Sandbank ; Teresa Cavendish; Teresa Walsh; Terri Doan; Thelia Robinson; Tiffany Booth; Tolanda Barnes; Tom Isakson; Toni Alvillar; Tony Bedolla; Tony Brackett; Tricia Cano; Tricia Goffene-Beyer ; Ty Yazzie; Valarie Donnelly; Veronica Chavez ; William Evans; William Houdek; William Rhoades; Xenia Gonzalez ; Yvette Ramirez ; Yvonne Taylor

Cc: Joy Johnson; candee.stanton@gmail.com; Karia Basta; Andrew Rael

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Peace & Justice,

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October 2015

Arizona Department of Housing (ADOH)

Balance of State Continuum of Care (BOSCOC)

Bonus--New Project Process for Announcement, Review and Ranking

The following is the process used by the AZBOSCOC related to the Announcement, Review and Ranking of new applications in 2015:

- Once notified of amount of funds available for bonus projects from HUD, the Arizona Department of Housing (CA) notifies interested parties via email and posts announcement of availability to ADOH. (attached)
- Applicants submitted applications within the required time period. Applicants were able to submit separate applications for permanent supportive housing for households that meet the definition of chronically homeless and rapid rehousing.
- Applications received were reviewed by a panel of three individuals outside of the COC but familiar with requirements and needs. Each application was scored using a review sheet that had been previously approved by the BOSCOC Advisory Governance Board.
- One application for PH and one application for RRH were approved for submittal in the 2015 BOSCOC application. Notification about the two projects was sent out via email (attached) on November 5, 2015. Applications were chosen based on the combined highest score from the review panel.

candee stanton

From: Karia Basta <karia.basta@azhousing.gov>
Sent: Tuesday, November 17, 2015 6:17 PM
To: Valarie Donnelly (ValarieD@wacog.com); Eliza Loudon; Chantel Padilla ; Alan Wentz; Alejandro Urquijo; Amanda LaPage; Anita Baca; Anthony Nelson; Arthur Askew; Austin Smith; Barb Mikkelsen; Barbara Blythe; Bekki Dupras; Brandi Nicol; Brandon Rawls; Brian Briggs; Brian Comerford; Camie Rasband; Carmen Gontes; Carole Benedict; Carrie Osborne; Cecile Mitchell; Chris Blivens; Chris Bolin; Chris Muhlenpoh; Chuck Arabas; Cindy Fores; Clemencia Cardenas; David Griffin; Dianna Guerrero; Donald Bratcher; Elizabeth Lees; Eric Gates; Erica Aguirre; Frank Brandenburg; Frank Real; Glennifer Mosher; Greg Billi; Guy Groff; Jacqueline Nairn; James Denes; Janet Conchy; Janet Pool; Jennifer Blomquist; Jennifer Burch; Jennifer Vokins; Jessica Jeffery; Jo Starr; John Espinosa; Jonathan Duncan; Jonathan Neumann; Jordan Layton; Joseph Massey; Joy Johnson; Julia De Los Reyes; Julie Montoya; Karia Basta; Katharina Krison; Katherine Scholz; Kathleen May; Kathy Tittle; Katie Dempsey; Kelly Tanner; Ken Repkie; Krystal Semmons; Laura Gastelum; Lauren Romano; Laurie DiLorenzo; Linda Jansen; Linda Northcutt; Lucia Matthews; Marco Torres; Maribel Najar; Marilyn Johnson; Marilyn Williams; Marti Burgan; Mary Contreras ; Mary McCoy; Megan Lee; Melanie Windecker; Melissa Fellure; Melissa Legate; Michael Ables; Michael Breedlove; Michael Kettunen; Michael McClure; Michelle Lewis; Michelle Thomas; Miguel Villalpando; Missy Paulsell; Morgen Whitney; Mykhaylo Kufryk; Patricia Kelly; Paul Sain; Pearl Bruno; Richard Brust; Richard Marten; Rochelle Neff; Romelia Lopez; Ross Altenbaugh; Sage Nelson; Sandal Richard; Sandi Flores; Sara Cagle; Sarah Bitsinnie; Scott McDowell; Shantae Smith; Shelly Smith-Blackwood; Sissy Stephens; Skye Biasetti; Stephanie Karles-Hall; Suzanne Payan; Sydney Axt; Teresa Walsh; Thomas Sheehy; Tim Abraham; Tim Miller; Tom Isakson; Toni Flores; Tricia Cano; Virginia Valadez; William Koehler; William Peck
Cc: <candee.stanton@gmail.com>; Karia Basta

Good evening! This is to inform the Arizona Balance of State Continuum of Care that CAHRA's (Community Action Human Resource Center) proposal for Rapid Rehousing funded through reallocation is the project that will be submitted in the 2015 NOFA. CAHRA serves Pinal County. Thank you to all agencies that submitted a proposal.

Karia Lee Basta
Special Needs Program Administrator
Arizona Department of Housing

October 2015

Arizona Department of Housing

Balance of State Continuum of Care (BOSCOG)

Reallocation Project Process for Identification, Announcement, Review and Ranking

The following is the process used by the AZBOSCOG for the identification, announcement, review and ranking of projects funded through reallocation.

- ADOH is the recipient of funds for BOSCOG and contracts with sub recipients for RRH, TH, and PH projects. As a result of this relationship, ADOH has an established process of monitoring sub recipient performance. Reallocation is considered when a sub recipient has not responded to ADOH monitoring findings within proscribed timelines and proscribed manner.

In some cases reallocation was also completed when sub recipients consistently were not expending their entire application. This only takes place after a process that provides an opportunity for the sub recipient to respond with corrective action.

The BOSCOG has reallocated funds as a part of the NOFA process since 2012.

- Once it is determined that funds will be available due to reallocation, the process used to solicit applications is similar to that used for bonus application.
- The Arizona Department of Housing (CA) notifies interested parties via email and posts announcement of availability to ADOH website. (attached)
- Applicants submitted applications within the required time period. Applicants were able to submit applications for rapid rehousing.
- Applications received were reviewed by individuals outside of the COG. Each application was scored using a review sheet that had been previously approved by the BOSCOG Governance Committee.
- One application for RRH were approved for submittal in the 2015 BOSCOG application.

2015 Balance of State Continuum of Care Application

Project Scoring Worksheet (Please complete one scoring worksheet for each application)

New Project

Your Name _____

Name of Agency _____ Project Name _____

Project

Justified Need-maximum 20 points _____

Did the applicant justify the need for the project? Is data used as part of the justification? Does the proposed project address the needs identified by the applicant?

Permanent Supportive Housing for the Chronically Homeless

Permanent Supportive Housing Chronically homeless maximum 20 points _____

Did the applicant clearly describe how the project would do outreach to serve persons and or families that meet the HUD definition of chronic homeless? Is it apparent they have knowledge of this segment of the society? If not, is it clear how they would work with an agency/ies that do have the knowledge?

OR

Rapid Rehousing for Individuals or Families--

Rapid Rehousing maximum 20 points _____

Did the applicant clearly describe how the project would do outreach to serve persons and or families that are appropriate for rapid rehousing. Is it clear how supportive services will be used to support individuals and families who access a rapid rehousing unit?

Other Attributes

Collaboration with other agencies and services-maximum 15 points _____

Does the applicant propose the use of a variety of community resources to help clients access a full continuum of care?

Use of mainstream resources-maximum 15 points _____

Does the applicant demonstrate how mainstream resources will be accessed?

Connection to employment resources-maximum 15 points _____

Does the applicant provide sufficient explanation about how participants will be connected to employment resources and opportunities?

Use of Coordinated Entry—maximum 15 points _____

Was there sufficient description about how coordinated entry and the VI-SPDAT will be used to determine individuals who are appropriate for the type of housing proposed?

Complete Application Submitted—maximum 10 points _____

Were all sections completed that are appropriate to the application? Were questions answered completely and in a way that was easy to understand?

Total Score _____

For ADOH USE ONLY

Administrative Capacity

Administrative Capacity-maximum 15 points _____

Does the organization have the skills and capacity to administer and manage the project?

Participation in the Continuum of Care-maximum 5 points _____

Attended 0 meetings-0

Attended 1 meeting-2

Attended 2 or 3 meetings-4

Attended 4 meetings - 5

Did applicant provide sufficient amount of match---10 points _____

Did applicant meet the 150% leverage threshold _____

150%-10 points

Did the budget reflect reasonable costs?—10 points _____



Arizona
Department
of Housing

Balance of State Continuum of Care Governance Charter and Operating Policies

1110 West Washington Street, Suite 310 | Phoenix, AZ 85007
Telephone: (602) 771-1000 | Facsimile: (602) 771-1002 | TTY: (602) 771-1001



**BALANCE OF STATE CONTINUUM OF CARE
GOVERNANCE CHARTER*
AND OPERATING POLICIES**

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* As outlined in the Federal Register 24 CFR Part 578, Homeless Emergency Assistance and Rapid Transition to Housing: Continuum of Care Program; Interim Final Rule.

Arizona Balance of State Continuum of Care Charter

1. PURPOSE

Homelessness is unacceptable in Arizona. All individuals and families have the right to safe, affordable housing in healthy communities with access to a network of supportive services.

This Charter identifies the mission, purpose, composition, roles, responsibilities and committee structure of the Arizona Balance of State Continuum of Care (BOSCoC).

The BOSCoC is a collaboration and inclusive community-based process. The Continuum is responsible for planning and managing homeless assistance resources and services effectively and efficiently. The Continuum includes representation from thirteen (13) counties including: Apache, Coconino, Cochise, Gila, Graham, Greenlee, La Paz, Mohave, Navajo, Pinal, Santa Cruz, Yavapai and Yuma.

The BOSCoC assists in the coordination, development and evaluation of housing and services for homeless and at-risk of homeless persons with housing needs through planning, education and advocacy. The BOSCoC provides planning and operational support to the continuum of care process including the designation of a Homeless Management Information System (HMIS).

2. MISSION

The mission of the BOSCoC is to end homelessness within the communities it represents and serves. It will do this through a seamless and collaborative network, by assisting eligible entities in obtaining the necessary funding needed to help vulnerable, low-income individuals and families attain and maintain economic self-sufficiency.

3. STRATEGIES

The BOSCoC utilizes the following strategies to address homelessness in balance of state geographic area:

- Identify housing needs of those at risk of facing homelessness.
- Increase access to permanent housing through rapid re-housing, transitional housing and permanent supportive housing.
- Increase access to other mainstream resources to promote housing stability.

- Coordinate services with emergency shelters including domestic violence shelters.
- Evaluate performance of services within the Balance of State through data collection and analysis.

4. ORGANIZATION

A. Local and Regional Representation: The Balance of State CoC is comprised of representatives from twelve (12) Local CoC and five (5) Regional CoC planning groups. These groups represent geographically and culturally diverse communities throughout the State of Arizona. Local groups include members who are representative of local programs either at the city or county level. Regional CoC planning groups were established to facilitate the continuum process throughout the state. The regions are as follows:

- a. Mohave, La Paz, Yuma
- b. Coconino, Yavapai
- c. Navajo, Apache
- d. Gila, Pinal
- e. Graham, Greenlee, Cochise, Santa Cruz

Members of the Local CoC designate representatives to attend the Regional CoC planning groups.

B. BOSCoC Standing Committees: In order to do the work of the continuum efficiently and effectively, standing committees were established which include: Guidance Committee, HMIS Committee, Membership Committee and Coordinated Assessment Committee. Project Review and Evaluation Committee and Point in Time Count Committee are two (2) annual ad hoc committees that will be formed each year for their respective specific purposes.

Representation for the standing committees is identified by the members of the Regional CoC planning groups. All standing committees will have a Chair and a Secretary that have been identified by the committee membership.

An agenda for each standing committee meeting will be posted on the ADOH website prior to each meeting and minutes will be posted after being approved.

In addition to the standing committees, ad hoc workgroups may be established from time-to-time to complete specific tasks. The chair of these ad hoc groups will provide updates about activities to the Guidance Committee as needed.

Membership in the standing committees will be drawn from the Local CoC planning groups. Each agency that receives funding through the BOSCoC will be required to participate in the HMIS committee and at least one (1) other committee. (See specific membership information for the Guidance Committee in that section.)

Membership in the ad hoc committees will be drawn from the entire BOSCoC membership.

C. Responsibilities of the BOSCoC Standing Committees:

NOTE: The Chairs of the HMIS, Membership, Coordinated Assessment, Evaluation and Point in Time will serve as liaison between the BOSCoC and the Guidance Committee.

a. Guidance Committee

The Guidance Committee is responsible for providing planning, coordination, guidance and direction for the use of U.S. Department of Housing and Urban Development (HUD) HEARTH CoC resources.

Responsibilities

- Provide direction and leadership for the application and data collection processes.
- Formal decisions of the CoC regarding application selection and/or reallocation of funds.
- Strategic planning and goal setting.
- Approval of the selection of membership for standing committees.
- Align and coordinate CoC with other homeless assistance and mainstream resources.
- Establish priorities and make decisions about the allocation of CoC resources.
- Evaluate both system wide and individual program performance related to established measurements.
- Receive reports and recommendations from ad-hoc workgroups
- Ensure that all necessary activities (e.g. point in time count) are being implemented by Regional and Local CoC planning groups.
- Disseminate information to the Regional CoC planning group members.
- Approves policies and procedures for the BOSCoC.

Membership

Members of the CoC Guidance Committee include:

- One (1) representative designated in each of the five (5) CoC Regions selected by regional membership.
- One (1) representative from the Arizona Department of Housing (ADOH).
- One (1) consumer representative (homeless or formerly homeless).

In total, there are seven (7) seats on the committee. A maximum of three (3) seats can be held by grantees in order to avoid potential conflicts of interest.

Operation

- The representative from ADOH will serve as the Chair of the Guidance Committee.
- A Co-Chair will be appointed from one (1) of the representatives from the Regional CoC planning groups.
- To accommodate for a change in terms and term limits, for the first year of the BOSCoC Guidance Committee, four (4) of the six (6) committee members will be elected for a one (1) year term and will be new-term eligible at the end of their respective staggered terms for a new two (2) year term.
- Members of the Guidance Committee may serve two (2) consecutive two (2) year terms and then must wait one (1) year before serving again.
- Guidance Committee can add new members by a majority vote of the existing members.
- Guidance Committee meetings may be held by teleconference on a quarterly basis. There will be one (1) meeting held at the Arizona Coalition to End Homelessness Annual Conference.
- The vote of a majority of members present and voting at a meeting at which quorum is present is enough to constitute an act of the Guidance Committee.
- Members that fail to attend regularly scheduled meetings without an alternate shall be subject to removal from the Guidance Committee by a vote of the Committee if they attend less than seventy-five percent (75%) of meetings. The Guidance Committee will require the Regional CoC to appoint a substitute in the event of the removal of a member of the Guidance Committee.

- Review Governance Charter annually to ensure it remains consistent with the CoC's objectives and responsibilities in accordance with the HEARTH Act and HUD regulations.

b. HMIS Committee:

Responsibilities

- To operate as outlined in the HMIS Governance Charter working with ADOH as the HMIS Lead Agency.
- Meet the HUD requirements to record and store client-level information on the characteristics and service need of persons experiencing homelessness.
- Utilize a HUD approved software system.
- Overall management and training related to the HMIS system.
- Working with HMIS software provider, including review of the HMIS policies and procedures annually.
- Assure compliance through review of quarterly data quality reports.
- Review how HMIS is functioning on a provider level.
- Develop data quality plans, security plans and policies and procedures by which HMIS will be governed.

c. Membership Committee:

Responsibilities

- Develop, review and recommend strategies for increasing membership in the Local and Regional CoC planning groups in accordance with the HEARTH Act.
- Make a public invitation for new members to join the BOSCoC at least annually.

d. Coordinated Assessment Committee

Responsibilities

- Develop uniformed/coordinated assessment tools.
- Assess uniformed/coordinated assessment.
- Develop a system to track information collected for the assessment of needs in each community.

e. Annual Ad Hoc Committees

f. Project Review and Evaluation Committee

Responsibilities

- Develop and update annually the evaluation tool/s.
- Review, score and rank renewal projects and new projects that will be submitted during the annual NOFA process.
- Assess and evaluate compliance and performance of ESG projects.

g. Point in Time Count Committee

Responsibilities

- Review point in time count surveys and data collection tools
- Support the logistics of the point in time count and housing inventory survey.
- Review data collected to assess accuracy.

5. ADOH ROLE AND RESPONSIBILITIES

The Arizona Department of Housing (ADOH) is the lead support agency and the Collaborative Applicant providing backup staff to the various committees and work groups of the BOSCoC and performing necessary functions such as Business and Operations Management for the BOSCoC, HMIS administration, performance monitoring, engagement and education of stakeholders and submission of the funding applications.

Responsibilities

- Fiscal Agent for the BOSCoC and Performing Financial Management Responsibilities as required by the HEARTH Act.
- Staffing of Committees when necessary.
- Providing Call in Number Access for Committee Meetings.
- Production of Planning Materials.
- Coordinate Needs/Gaps Assessments.
- Collect and Report Performance Data.
- Monitor Program Performance.
- Coordinate Resources, Integrate Activities and Facilitate Collaboration.
- Prepare the Collaborative Application for CoC Funds (Exhibit 1). This includes but is not limited to the following:

- Adherence to the HUD published NOFA for the Continuum of Care each year.
- Registration on e-snaps including the completion and submission of the Grant Inventory Worksheet (GIW).
- Preparation of the Consolidated CoC including Project Priority List.
- Apply for Planning Grants.
- Build Awareness of CoC Related Issues.
- Recruit Stakeholders.
- Manage the HMIS System as the Lead Agency for BOSCoC.

6. HOMELESS MANAGEMENT INFORMATION SYSTEMS (HMIS)

ADOH is the primary lead for the Balance of State HMIS system. ADOH will work with the contracted HMIS Software Provider and the HMIS Committee to ensure all HMIS activities are carried out in accordance with the HEARTH Act. All agencies within the BOSCoC must comply with HMIS requirements for CoC funding as well as all state homeless service funds. HMIS policies and procedures will be reviewed and updated on an annual basis in accordance with HMIS data standards and the HEARTH Act.

7. REPORTING

- Proceedings of all committee meetings are documented in minutes.
- Minutes of all meetings are circulated and approved in a timely manner.
- Approved minutes will be posted on the ADOH website.

8. CONFLICTS OF INTEREST

Each member of the Guidance Committee will disclose their relationship to any agenda item requiring a vote during discussion of the agenda item. No member of the Guidance Committee may vote upon any matter which financially benefits them or the organization that the member represents. This includes all decisions with respect to funding, awarding contracts and implementing corrective actions.

9. SPOKESPERSON

The Chair of the Guidance Committee shall be the spokesperson and point of contact for the BOSCoC.

Arizona Balance of State Continuum of Care Data Quality Plan



Quality Data Assures Quality Decisions

Acknowledgements: Symmetric Solutions, Inc. prepared this document under the direction of the Arizona Department of Housing, using the *From Intake to Analysis: A Toolkit for Developing a Continuum of Care Data Quality Plan* prepared for HUD by Cloudburst Consulting Group, Inc.

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Approved by the Arizona Balance of State Continuum of Care HMIS Advisory Committee on May 15, 2013. Revised per HUD 2014 Data Standards Manual December 15, 2014.

Revisions

Date	New Policy	Revised Policy/Form	Policy Section	Policy or Form Name
12/2014	Add UDEs	2014 HUD Data Standards	Appendix A	HUD Required
6/3/2015	Required data elements for PATH and Outreach Projects	Arizona Path Recording Building Protocols HUD TA 5/15/2015	Timeliness	HUD Required

Introduction

This document describes the Homeless Management Information System (HMIS) data quality plan for the Arizona Balance of State Continuum of Care (BOS COC). It was developed by the BOS HMIS Lead Agency Arizona Department of Housing (ADOH) in conjunction with the BOS HMIS Advisory Committee to identify roles and responsibilities and to set policies and protocols regarding data quality. This plan has been reviewed and approved by the BOS COC.

This Plan works in conjunction with BOS Policies and Procedures and the BOS Data Security plan documents. All documents will be reviewed and updated annually to include the latest HUD HMIS data standards and locally developed performance plans.

Purpose

This Plan is to ensure that ongoing data quality monitoring meets or exceeds the Department of Housing and Urban Development's (HUD) requirements. The BOS recognizes that readily available, accurate, timely and complete data facilitates the ability to plan and strategize statewide efforts to end homelessness.

Background

HMIS, a locally administered electronic data collection system, stores longitudinal person-level information about the men, women, and children who access homeless and other human services in a community. Because the BOS receives HUD Continuum of Care (COC) funding, it must implement and maintain an HMIS to capture standardized data about all persons accessing the homeless assistance system. Furthermore, elements of HUD's annual COC funding competition are directly related to a COC's progress in ending homelessness which is supported by data from the HMIS.

In 2004, HUD published in the Federal Register the HMIS Data and Technical Standards which define the requirements for data collection, privacy safeguards, and security controls for all local HMIS. In March 2010, HUD published changes in the HMIS Data Standards Revised Notice incorporating additional data collection requirements for the Homelessness Prevention and Rapid Re-Housing Program (HPRP) funded under the American Recovery and Reinvestment Act (ARRA). Final HMIS data standards were published by HUD in 2014 in the HMIS Data Standards Manual, Version 2.1 and the HMIS Data Standards: HMIS Data Dictionary.

Locally, the Arizona Balance of State HMIS (initially called the Rural Arizona Continuum of Care HMIS) launched in 2004 with software vendor Bowman Systems, Symmetric Solutions, Inc. as System Administrator providing technical support and training, and ADOH serving as the HMIS Lead Agency. In 2014, Community Information and Referral Services (www.211Arizona.org) took over as the System Administrator for the Balance of State HMIS.

Goals

Maintain data quality

Data quality refers to the reliability and validity of client-level data collected in the HMIS database and measures the extent to which the client data in the database reflects actual client information. Reliable data revolves around assessment characteristics such as timeliness, completeness and accuracy. This document sets policies to maintain data quality.

Formalize monitoring plan

Constant and consistent analysis and reporting of HMIS data at both the program and aggregate system levels assure a greater level of data reliability and validity. The monitoring plan outlines the set of procedures performed on a regular, on-going basis and includes the timeline and frequency to review data. It tracks and generates information necessary to identify areas for data quality improvement.

Data Quality Components and Policies

There are three necessary components to maintaining data quality: timeliness, completeness, and accuracy of data entry.

1. Timeliness

Entering data in a timely manner reduces human error and ensures community data accessibility.

Policy: Daily Timeframe

Each program type enters applicable data as soon as possible but within the prescribed timeframe:

Data Entry Timeframe

PROGRAM TYPE	DATA ELEMENT	TIMEFRAME ENTRY
Emergency Shelters:	Universal Data Elements, Housing Check-In/Check-Out	7 calendar days after the check-in/check-out time
Transitional and Permanent Supportive Housing Programs:	Universal Data Elements, Program: Check-In/Check-Out	7 calendar days
Rapid Re-Housing and Homelessness Prevention Programs:	Universal Data Elements, Program-Specific Data Elements	7 calendar days after enrollment/eligibility is established
Outreach Programs:	Limited data elements; non-identified client information or aliases are allowed while outreach staff develop client relationships and when client refuses to provide information. Programs are required to keep track of non-identified client and alias information and must not create a new record if one already exists	7 calendar days of the initial encounter. Upon engagement for services, the client record must be amended with individually identifiable information, all remaining Universal Data Elements, and all Program Specific Data Elements and be entered within 7 calendar days of client engagement.

Policy: Monthly Timeframe

Each Agency Administrator must review all data for the month by the fourth working day of the following month. Example: All data for the month of January is complete and accurate by February fourth.

2. Completeness

All data entered into the HMIS shall be complete with a goal to collect 100% of all data elements; however, the BOS recognizes that this may not be possible in all cases. Therefore, the BOS established an acceptable range of null/missing and unknown/don't know/refused responses, depending on the data element and the type of program entering data.

Policy: Unique ID numbers

All clients receive a unique HMIS ID number which is automatically generated by the HMIS.

Policy: All Clients Served

All HMIS programs enter data on one hundred percent (100%) of their served clients except for those clients who refuse to have their data entered into HMIS.

Policy: Missing/Unknown data

Must be less than 5% per month in HUD required variable fields.

Acceptable Missing or Unknown Response Range by Program Type

Data Element	TH, PSH, RRH, HP		ESG, Non-HUD SSO		OUTREACH-date of enrollment	
	Missing	Unknown	Missing	Unknown	Missing	Unknown
First & Last Name	0%	0%	0%	0%	0%	0%
SSN	0%	0%	0%	5%	0%	5%
Date of birth	0%	0%	0%	2%	0%	2%
Race	0%	5%	0%	5%	0%	5%
Ethnicity	0%	5%	0%	5%	0%	5%
Gender	0%	0%	0%	0%	0%	0%
Veteran Status (Adults)	0%	5%	0%	5%	0%	5%
Disabling Condition (adults)	0%	0%	0%	5%	0%	5%
Residence Prior to Entry	0%	0%	0%	0%	N/A	N/A
Housing Status (Entry)	0%	0%	0%	0%	N/A	N/A
Housing Status (Exit)	0%	5%	0%	30%	N/A	N/A
Income & Benefits (Entry)	0%	0%	N/A	N/A	N/A	N/A
Income & Benefits (Exit)	0%	5%	N/A	N/A	N/A	N/A
Add'l PDES (Adults, Entry)	0%	5%	N/A	N/A	N/A	N/A
Destination (Exit)	0%	5%	0%	30%	N/A	N/A

Policy: Bed Count

Agency Administrators periodically update bed and unit counts in the HMIS database to ensure accuracy.

Data Entry Timeframe for Bed Counts

PROGRAM TYPE	TIMEFRAME ENTRY
Emergency shelters	monthly, within 4 days of the month's end
Scattered-site programs (TH or PH)	quarterly, within 4 days of the month's end
Project-based program	annually, within 4 days of the contract end date

Policy: Bed Utilization Rate

Upon exiting a program, the End-User exits the client from the bed or unit in the HMIS. The acceptable range of bed/unit utilization rates for established projects is:

Bed Utilization Rate (Calculated Beds available/Beds used)

PROGRAM TYPE	PERCENTAGE UTILIZED
Emergency shelters	75-105%
Transitional Housing	80-105%
Permanent Supportive Housing	85%-105%

Exception: Since new projects may require time to reach the projected occupancy numbers, the bed utilization rate requirement will be relaxed during the first operating year.

3. Accuracy

Accurate data provides a view of homelessness and the services provided by a community within the BOS. Imprecise or false data creates an inaccurate picture of homelessness within a community and may either create or diminish gaps in services. Every agency must understand and emphasize to clients and staff the importance of accurate information.

Periodic updates and error correction must be completed on a monthly basis. HMIS data must accurately reflect the client data and services provided within the agency's client file. For example, the HMIS "Shelter Exit Date" must be the actual date the client physically exited the shelter.

Policy: Inaccurate data

BOS COC strictly prohibits recording inaccurate information. In the case of a client who refuses to provide correct personal information, enter "client refused."

Policy: Data consistency

End-Users collect and enter data in a common and consistent manner across all programs and agencies. All end-users will receive initial training by Community Information and Referral before accessing the live HMIS system. This ensures the data is understood, collected, and entered in an organized manner. Periodic advanced training and refresher courses also help to maintain the standard.

Policy: Aliases

When a client refuses to provide his/her or dependant's personal information and the program funder does not prohibit it, the End-user may enter client data under an alias using the following:

- Create the client record, including any family members, under an **assumed** first & last name
- Set the date of birth to 1/1/XXXX, where XXXX is the actual year of birth
- Answer any other identifiable elements as "client refused"
- Make a notation of the alias in paper client file and include the corresponding HMIS Client ID

An alias may not be added if a client's record already exists in HMIS database.

Note: Entering Alias client records may affect the Agency's overall data completeness and accuracy rates; also the Agency holds responsibility for any duplication of services that may result from hiding the actual name under an alias.

Policy: Data Consistency Checks

Agency Administrators will check accuracy and consistency of data by running quarterly program pre-enrollment, co-enrollment, or post-enrollment data analysis to ensure that the data "flows" in a consistent and accurate manner. For example, the following instances will be flagged and reported as errors:

- Mismatch between exit/entry data in subsequent enrollment cases
- Co-enrollment or overlapping enrollment in the same program type
- Conflicting assessments
- Household composition errors

Exception: With the approval of the HMIS Lead Agency, the System Administrator may serve as Agency Administrator for agencies with limited staff.

Data Quality Monitoring Plan

ADOH, the HMIS lead agency, works with the System Administrator to set a schedule to annually monitor each participating agency to ensure data quality. Roles and responsibilities of monitoring for each policy are outlined in this section.

Policy: Data Timeliness

The Agency Administrator:

- Runs and reviews custom timeliness reports in ART and Report Writer including all participating programs of different types.
- Emails the summary report and any related client detail reports to the System Administrator during the first week of the following month.
- Improves Agency's data timeliness or provides explanation before the next month's report.

The System Administrator:

- Reviews the report and assists the agency regarding any issues.
- Reports persistent issues to ADOH for advisement.

Policy: Data Completeness

The Agency Administrator:

- Runs and reviews reports such as the APR, Universal Data Quality, or custom ART or Report Writer reports.
- Compares any missing rates to the data completeness benchmarks (Acceptable Missing or Unknown Response Range chart, page 4).
- Emails the summary report and any related client detail reports to the System Administrator during the first week of the following month.
- Improves their data completeness rate or provides explanation before the next month's report.

The System Administrator:

- Reviews the report and assists the agency regarding any issues.
- Reports persistent issues to ADOH for advisement.

Agency Administrator Tasks	If annual number of households served < 200	If annual number of households served > 200
Run Open Cases Report Exit cases that should be closed. Enter cases that should be open.	Monthly	Weekly
Run Missing Data Report Correct missing data to be within thresholds. (See Page 4.)	Monthly	Weekly
Pull 10% of paper files and check against HMIS data to verify data accuracy.	Monthly	Monthly
If shelter, run Bed List Report Verify accuracy against paper shelter list.	Weekly	Weekly
If shelter, run Bed List Report Check Bed List to verify that number of open cases on HMIS report equals number of households on Bed List.	Monthly	Weekly
Issue QA report to program directors on status of QA check.	Monthly	Weekly

Policy: Data Accuracy

During the annual site visit, the System Administrator will request a percentage of client files or intake forms to compare to the information entered into the HMIS database. The review only includes parts of the client file which contain the HMIS required information and excludes any non-relevant, personal or agency specific information.

The Agency Administrator:

- Makes source documentation of client information available to System Administrator.
- Assists System Administrator during site visit.

The System Administrator:

- May, in advance, send a list of potential client IDs to be reviewed to the Agency Administrator.
- Visits the agency on site.
- Compares the source documentation with data entered in the HMIS database.
- Compiles a report of discrepancies and identifies with Agency Administrator potential work flow issues and possible advance End-user training needs.
- Emails the report (and Agency Solution Plan if necessary) to ADOH.

Exception: Outreach programs may be exempt from the Data Accuracy Review.

Note: Data quality monitoring may be performed outside of the regularly scheduled reviews if requested by program funders or other interested parties (the agency itself, HMIS Lead Agency, COC, HUD, or other Federal and local government agencies).

Compliance

Policy: Data Timeliness

The average timeliness rate in any given month should be within the allowed Timeframe. (See Data Entry Timeframe table, page 3)

Policy: Data Completeness

There should be no missing (null) data for required data elements. Responses that fall under unknown ("don't know" or "refused") should not exceed the allowed percentages in any given month. Housing providers shall stay within the allowed utilization rates.

Policy: Data Accuracy

The percentage of client files with inaccurate HMIS data shall not exceed 10%. For example, if the sampling includes 10 client files, then 9 out of 10 of these files must have the entire set of corresponding data entered correctly in HMIS.

Data Quality Reports

The System Administrator:

- Runs data quality-monitoring reports.
- Contacts Agency Administrator or End-user regarding data entry quality.
- Assists Agency Administrator in finding causes and recommends corrective measures.
- Notifies ADOH about non-compliance for required HMIS participation when the agency fails to make corrections and/or makes repeated or excessive data quality errors.

ADOH:

- Reviews HMIS data quality reports and certifies funding applications, including COC and ESG programs.
- May recommend that the COC deny funding due to low HMIS data quality scores.

APPENDIX A: DATA REQUIREMENTS

Universal Data Elements

- Name
- Social Security Number
- Date of Birth
- Race
- Ethnicity
- Gender
- Veteran Status
- Disabling Condition
- Residence Prior to Program Entry (Prior Living Situation)
- Program Entry Date
- Program Exit Date
- Destination
- Personal ID
- Household ID
- Relationship to Head of Household
- Client Location
- Length of Time on the Street (Extent of Homelessness)

Program Specific Data Elements Standards

- Housing Status
- Income and Sources
- Non-Cash Benefits
- Health Insurance
- Physical Disability
- Developmental Disability
- Chronic Health Condition
- HIV/AIDS
- Mental Health
- Substance Abuse
- Domestic Violence
- Contact
- Date of Engagement
- Services Provided
- Financial Assistance Provided
- Referrals Provided
- Residential Move-In Date
- Housing Assessment Disposition
- Housing Assessment at Exit

Required Screens in HMIS

- Client Tab General Information
 - Household
 - Finance
 - Veteran (if applicable)
 - Special Needs
 - Employment
- Client Visit Tab
 - Services

Programs (follow ups, etc.)
Assessment (Barriers to Housing Stability)
Progress



Arizona
Department
of Housing

HMIS Policies and Procedures

Revision Date: June 3, 2015

Date Issued: November 14, 2014

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Adopted by HMIS Committee: October 1, 2014

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Vision Statement

The vision of Arizona Balance of State Continuum of Care (AZBOSCOC) is to operate a user-friendly data collection system that produces timely, accurate, and complete information for stakeholders to use, ensuring the effective delivery of housing and services to end homelessness in Arizona.

Introduction

The AZBOSCOC Homeless Management Information System (AZBOSCOC HMIS) was developed to support the Arizona Department of Housing (ADOH) partner agencies in their missions, by supplying them with the tools to meet the reporting requirements for their projects. The AZBOSCOC HMIS provides information to the U.S. Department of Housing and Urban Development (HUD), local nonprofits, state-level policy makers, federal partners and other advocates in the mission to end homelessness.

The AZBOSCOC HMIS is a client information database that provides a standardized assessment of client needs, creates individualized service plans, and records the use of housing and services. The fundamental goal of the AZBOSCOC HMIS is to use the data to determine the utilization of services of participating agencies, identify gaps in the local service continuum and develop outcome measurements, according to the HUD/AZBOSCOC HMIS standards. The AZBOSCOC HMIS can identify patterns in the utilization of assistance, as well as document the effectiveness of services for clients.

All this will be accomplished through data analysis of the actual experiences of homeless persons, as well as the service providers who assist them in shelters and homeless assistance projects throughout the state. This data may also be analyzed to provide unduplicated counts and anonymous aggregate data to policy makers, service providers, advocates and consumer representatives. Statewide reporting is based on aggregate, non-identifying data; therefore, such data may be shared by ADOH with the public without specific permission.

The AZBOSCOC HMIS uses a web-based software project from Bowman Systems called ServicePoint, which resides on a central server to facilitate data collection by homeless service organizations across the state. Access to the AZBOSCOC HMIS is limited to agencies and authorized staff members who have met the necessary training requirements and have signed the necessary privacy, data sharing (if applicable), security and licensing documentation (if applicable), as listed in this manual. As the guardians entrusted with personal data, agencies have both a moral and a legal obligation to ensure that data is being collected, accessed and used appropriately. All agencies must be vigilant to maintain client confidentiality, treating the personal data of Arizona's most vulnerable populations with respect.

Every project that receives federal homeless project funds from HUD is required to enter data on persons served with those funds into the AZBOSCOG HMIS. Some projects funded through the U.S. Veterans Administration and the U.S. Department of Health and Human Services may be required to enter data into the AZBOSCOG HMIS, as well. In addition, the AZBOSCOG encourages agencies that do not receive federal funds to participate in the AZBOSCOG HMIS so that service provision in the AZBOSCOG is coordinated and that data represents the broader network of service provision in the continuum.

The data standards also require organizations to comply with any federal, state and local laws that require additional confidentiality protections, including but not limited to:

- The Health Insurance Portability and Accountability Act of 1996 (45 CFR Parts 160 and 164);
- The Confidentiality of Alcohol and Drug Abuse Patient Records Rule (42 C.F.R. Part 2);
- The Violence Against Women Act (VAWA).

As these data standards are subject to change, all providers are responsible for monitoring for updates and being in constant compliance with all data standards.

AZBOSCOC HMIS

The Arizona Department of Housing (ADOH) is the lead agency for AZBOSCOC HMIS implementation in the Arizona Balance of State Continuum of Care.

- AZ Balance of State Continuum of Care Code (thirteen (13) counties) - AZ-500

To ensure the integrity and security of sensitive client confidential information and other data maintained in the database, ADOH requires all participating agencies sign the AZBOSCOC HMIS Partnership Agreement (Attachment A). All end users must sign a Code of Ethics Agreement (Attachment B) prior to being given access to the AZBOSCOC HMIS. All clients must sign a Client Acknowledgement Form (Attachment C) prior to entry of the individual's data into the system.

Terminology

Many of the terms used in the AZBOSCOC HMIS Policies and Procedures Manual may be new to many readers. It is important to understand the terms used to better understand the roles, responsibilities and liabilities of the AZBOSCOC HMIS.

Advanced Reporting Tool (ART): Bowman Systems partners with S.A.P. Business Objects to give users access to a wide variety of reports. The ART is used commonly for federal reporting and project customization of reports.

Agency Administrator: This person is responsible for HMIS administration at the participating agency level and is the lead agency contact with ADOH.

Annual Homeless Assessment Report (AHAR): The report to the U.S. Congress on the extent and nature of homelessness in America.

Annual Performance Report (APR): The HUD-required report used to track progress and accomplishments of COC-funded projects.

Arizona Balance of State Continuum of Care (AZBOSCOC): The HUD recognized Continuum of Care comprised of homeless programs in thirteen counties within the State of Arizona. The counties covered by the AZBOSCOC are: Apache, Cochise, Coconino, Gila, Graham, Greenlee, La Paz, Mohave, Navajo, Pinal, Santa Cruz, Yavapai and Yuma.

Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS): The database used collectively by partnering agencies within the Arizona Balance of State Continuum of Care to track coordinated assessment, service needs, progress and accomplishments of clients.

Arizona Department of Housing (ADOH): The lead entity for the AZBOSCOC HMIS implementation and Collaborative Applicant for the AZBOSCOC.

Authentication: The process of identifying a user to grant access to a system or resource based on a username and password.

Bowman Systems: Often referred to just as “Bowman”, this is the company/vendor who wrote the AZBOSCOC HMIS software, ServicePoint, and which ADOH maintains a yearly contract for maintenance purposes.

Client: An individual who has inquired, is receiving, or has received, *services* from a participating project about whom a participating AZBOSCOC HMIS project collects or maintains personally-identifiable information.

Client Acknowledgement Form: The form signed by clients authorizing or denying information to be collected and shared via the AZBOSCOC HMIS project.

Code of Ethics Agreement: An agreement between participating agency users and ADOH that allows access to AZBOSCOC HMIS.

Continuum of Care (COC) Project: Project receiving funding from HUD through the competitive COC application process. These projects are identified in the AZBOSCOC HMIS as COC projects.

Executive Director: A person who serves as the top executive official of a participating agency. This person may have a title of chief executive officer or president, etc.

Housing Inventory Count (HIC): The inventory of beds for homeless persons, including seasonal and overflow beds.

Participating Agency: Any agency/project that enters client-level information into AZBOSCOC HMIS.

Point In Time (PIT): The annual **count** of sheltered and unsheltered homeless persons on a single night.

Release of Information (ROI): A statement signed by the client authorizing or denying the participating AZBOSCOC agency/project to give other participating agencies their personal information and information regarding the client's situation.

ServicePoint: A software package written by Bowman Systems, which tracks data about people in housing crisis to determine individual needs, provide a referral system and create aggregate data for reporting and planning. The software is web-based and uses a standard graphical user interface similar to Microsoft Windows.

System Administrator: The staff contracted by ADOH as BOSCOC System Administrator for the AZBOSCOC HMIS. Community Information and Referral is the current System Administrator for AZBOSCOC HMIS.

User: An individual who has been granted access and uses AZBOSCOC HMIS. Users are the main guardians against violating a person's confidentiality.

VI-SPDAT: The Vulnerability Index and Service Prioritization Decision Assistance Tool is an assessment tool distributed by OrgCode Consulting Inc. designed to help prioritize housing services for homeless individuals based on the acuity of their needs and personal situation.

VI-F-SPDAT: The VI-SPDAT adapted for assessment of homeless families.

Roles and Responsibilities

Arizona Department of Housing (ADOH)

ADOH is the lead agency for the implementation and maintenance of the statewide AZBOSCOC HMIS.

AZBOSCOC HMIS Management

Policy: ADOH is responsible for the organization and management of the AZBOSCOC HMIS. ADOH is responsible for all system-wide policies, procedures, communication and coordination of the AZBOSCOC HMIS. ADOH will act as liaisons between agencies and System Administrator.

Procedure: ADOH and contracted System Administrator will follow protocols established by Bowman Systems, LLC, in regard to unauthorized access, as established on pages nine (9) and ten (10) of the Bowman Systems Securing Client Data Policy Manual. A member of ADOH and/or System Administrator will notify Bowman Systems of any software issues within twelve (12) hours of being made aware of the issue and an investigation at the state level has taken place. All information received from Bowman Systems pertaining to use, access, reporting or live site system will be disseminated to Executive Directors or his/her designee within three (3) business days of receipt. No user, Executive Director or agency may contact Bowman System directly, without the express written consent of ADOH. System Administration may contact Bowman System to coordinate system updates, software issues and other system administration functions.

AZBOSCOC HMIS Documentation

This includes this AZBOSCOC HMIS Policies and Procedures Manual, the AZBOSCOC Data Quality Plan, the AZBOSCOC HMIS Code of Ethics Agreement, the AZBOSCOC HMIS Partnership Agreement, the Agency Profile Form, the Client Acknowledgement Form and all other related forms.

Policy: ADOH will provide the necessary manuals and forms for all users. These documents will be kept up-to-date and in compliance with all HUD policies and requirements. Agency Administrators will be responsible for downloading and distributing to end users within the agency the HUD Data Standards Manual and available on the HUD Exchange website <https://www.hudexchange.info/>.

Procedure: ADOH will update the AZBOSCOC HMIS Policies and Procedures Manual, the Code of Ethics Agreement, the Partnership Agreement, the Client Acknowledgement Form, the Agency Profile Form and related forms annually. Agencies must submit an updated Agency Profile Form when changes occur in the programs that necessitate updating. By the beginning of each calendar year, the documents will be reviewed and updated. In the event HUD issues interim changes to the requirements, affected policies and procedures and any related documentation will be reviewed and updated at that time, as well. All changes will be communicated to participating agencies through the HMIS system (i.e., "System News") and electronically through the end user e-mail distribution list. All documents will be available for download at www.azhousing.gov, the System Administrator website (www.211Arizona.org) and the ServicePoint home page.

Security Management

Policy: ADOH and System Administrator will be responsible for the continuous monitoring of security and user access.

Procedure: Refer to Bowman Systems Securing Client Data Policy Manual (Attachment D).

Training

Policy: System Administrator will provide timely training for all new users, continuing education and ART reporting in the most efficient and effective way possible.

Procedure: ADOH and/or System Administrator will notify participating agencies and users of upcoming trainings through the System News available in ServicePoint and/or electronically. Agencies will be given no less than thirty (30) days advance notification of such trainings on the calendar. System Administrator will conduct all new user training, specialized training relevant to user position and report training. At no time will a participating agency contact Bowman directly for training. The System Administrator will send training confirmation responses to registered users within three (3) business days of online registration.

Agency Management

Policy: Upon notification from ADOH that appropriate documentation has been received by ADOH, the System Administrator will set-up and terminate agencies, projects and users, as needed.

Procedure: Agencies will notify ADOH of new projects and new users electronically or by telephone by contacting Karia Basta at karia.basta@azhousing.gov or (602) 771-1085 or Anne Scott at anne.scott@azhousing.gov or (602) 771-1017.

User Management

Policy: ADOH and/or the System Administrator will give appropriate levels of access to the system based on user's position in the participating agency, configuration of projects and designation by the Executive Director.

Procedure: ADOH in consultation with the participating agency Executive Director or his/her designee will assign appropriate user levels when adding a new user. ADOH will always assign the most restrictive access to users while still allowing efficient job performance to protect client confidentiality or privacy.

System Availability

Policy: Bowman Systems will provide a highly available AZBOSCOC HMIS and will inform users in advance of any planned interruption in service.

Procedure: Scheduled upgrades and maintenance will occur on Friday nights after 9:00 p.m. MST. The System Administrator will inform users of the exact date and time at least five (5) business days prior to scheduled upgrade via ServicePoint System News and direct e-mail to all end users on record. In the event of an unscheduled unavailability, the System Administrator will contact the end users via email and inform them of the cause and the anticipated duration of the interruption of service. Users will be notified as quickly as possible of system unavailability, but in no case more than twenty-four (24) hours after service interruption.

Participating Agency

A participating agency is one that enters client-level data into the AZBOSCOC HMIS.

Security Management

Policy: Agencies are responsible for ensuring all hardware and software used to access and/or store AZBOSCOC HMIS client-level data is in a secure location where access is restricted to authorized staff.

Procedure: Agencies may be monitored for security by ADOH through on-site compliance visits. Failure to comply will result in deactivation of all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Agencies **MUST** have:

- A secure broadband Internet connection.
- Wi-Fi is acceptable, **if** the connection is protected by a network security code.

All Workstations at the participating agency that access the AZBOSCOG HMIS **must** have:

- Memory:
 - ✓ If Win7 - 2 Gig minimum
 - ✓ If Vista - 2 Gig minimum
- Monitor:
 - ✓ Screen Display - 1024 by 768 (XGA) or higher (1280 by 768 strongly advised)
- Processor:
 - ✓ A Dual-Core processor
- Browser:
 - ✓ Firefox is recommended
 - ✓ Chrome is an alternate
 - ✓ Internet Explorer is an alternate
- Password Protected Workstation:
 - ✓ All workstations **must** be manually locked by the user if a licensed user leaves a workstation when ServicePoint is active. The system will automatically lock after 15 minutes of inactivity.
- Current and Active Security:
 - ✓ Real-time antivirus scanning
 - ✓ Manual virus scanning
 - ✓ Automatic virus removal
 - ✓ USB virus scanning
 - ✓ Anti-spyware
 - ✓ A firewall
 - ✓ Anti-phishing
 - ✓ Anti-spam

Records Management

- Policy:** The participating agency must maintain appropriate documentation of any client Release of Information and Client Acknowledgement Form records obtained in a secure location for a period of five (5) years after the last date of client service and assure their subsequent destruction by shredding. In addition, agencies must keep Agency Profile Forms, Agency Partnership Agreements, Data Sharing Agreements, Opt-out Requests, grievance documentation and all other HMIS related documentation in a secure location for a period of five (5) years.
- Procedure:** Records must be made available to the client, upon written request, within fourteen (14) business days. Compliance monitoring is completed by ADOH, as requested by funders or required by regulation. Agencies will be required to show proof of compliance with the above policy at time of compliance monitoring. Failure to comply will result in deactivation of all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Privacy Management

- Policy:** Agencies will be solely responsible for ensuring clients understand privacy. With the exception of agencies providing services solely to children and youth, all agencies must obtain a signed Client Acknowledgement Form and a Release of Information form from each client before entering data into the AZBOSCOC HMIS. Clients in Runaway and Homeless Youth Programs and private programs that serve only children and youth will NOT be asked to provide a Client Acknowledgement Form or a Release of Information form. All HMIS agencies must post a Privacy Notice at all intake locations. A copy of the Privacy Notice will be made available to all clients at the client's request.
- Procedure:** A copy of the Privacy Notice and the current Client Acknowledgement Form can be found at www.azhousing.gov. Clients may opt out of permitting the entry of their data into the AZBOSCOC HMIS. In that case, clients would be entered utilizing the "enter anonymous client function" or by locking the record. Records may be locked by contacting the System Administrator. The Client Acknowledgement Form will be in effect for one (1) year from the date of signing. Upon Recertification of client, new Client Acknowledgement Form must be signed for all programs except those serving solely children and youth.

Compliance monitoring is completed by ADOH, as requested by funders or required by regulation. Agencies will be required to show proof of compliance with above policy at time of compliance monitoring. Failure to comply will result in deactivation of all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Data Sharing

- Policy:** Data sharing among participating AZBOSCOC HMIS agencies will be supported for those agencies with a signed Data Sharing Agreement indicating a desire to share data. All HOPWA projects are prohibited from participation in data sharing. Data sharing related to coordinated assessment may be approved by the AZBOSCOC Governance Committee to facilitate continuum-wide coordinated assessment in compliance with HUD regulations. Data sharing related to coordinated assessment does not need prior approval by participating agencies. Participating agencies may opt-out of data sharing.
- Procedure:** All projects, with exception of HOPWA, will have the opportunity to share data for client-level data. The standard level of client-level data sharing privileges will be set by the HMIS Committee and/or the Governance Committee. Participating agencies may sign a Data Sharing Agreement agreeing to share data detailed in the Data Sharing section of this manual beginning on page twenty-five (25). Agencies wishing to opt out shall complete a Data Sharing Exit Form. Each participating agency will retain a copy of the agreement and a master will be filed with ADOH. Agencies wishing to opt out of data sharing through the AZBOSCOC HMIS are required to submit a Data Sharing Exit Agreement signed by the Executive Director or his/her designee stating their reasons for opting out and submit to ADOH for consideration.

Executive Director

The Executive Director or his/her designee is responsible for ensuring their agency and all licensed users within their agency abide by all COC established regulations, standards, policies and procedures in regards to the AZBOSCOC HMIS and clients' rights.

Documentation

- Policy:** Before any agency user is given access to the AZBOSCOC HMIS, the Executive Director or his/her designee must complete and submit the necessary original documentation to ADOH to keep on file at ADOH.

Procedure: The Executive Director or his/her designee **must** read, understand, and sign the AZBOSCOC HMIS Partnership Agreement annually. Read, understand, and sign each of the agency's users' AZBOSCOC HMIS Code of Ethics Agreements annually. Update the Agency Profile annually.

In addition, the Executive Director must comply with applicable funding agreement requirements regarding the AZBOSCOC HMIS participation. Submit original documents to ADOH by U.S. Postal Service at:

Arizona Department of Housing
Attn: Anne Scott
1110 West Washington Street, #310
Phoenix, AZ 85007

Failure to comply will result in deactivation of all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Ultimately Responsible

Policy: The Executive Director or his/her designee is the person ultimately responsible for compliance with all policies and procedures in this manual; which includes but is not limited to: knowledge and understanding of client rights, grievance procedures, data sharing, agencies security and all actions and work conducted by licensed users in their agency, including those no longer employed at their agency.

Procedure: The Executive Director must verify and sign all reports or information distributed by their agency for submission or publications. The Executive Director or his/her designee must notify ADOH or System Administrator within twenty-four (24) hours if a user should be removed from the AZBOSCOC HMIS by calling the AZBOSCOC HMIS Help Desk at (602) 908-3605 or contacting the System Administrator at HMISsupport@CIR.org.

The Executive Director or his/her designee must complete the data quality report and submit to ADOH annually or upon request. The Executive Director must verify and sign all client requests for information or grievances prior to the release of information to the client and adhere to any additional requirements that may be deemed necessary by the funder or the COC. The Executive Director is responsible for ensuring that all HMIS users comply with the Code of Ethics agreement.

Agencies with users who fail to comply with the Code of Ethics agreement may be suspended from the AZBOSCOC HMIS. Failure to comply may result in deactivation of

all agency user accounts and the agency may be non-compliant with HUD and/or other funding regulations.

Agency Administrator

An Agency Administrator is the liaison between ADOH/System Administrator and all other agency users. Agency Administrators will be given the role of “Agency Administrator” in the AZBOSCOC HMIS.

All Agency Administrators must have an e-mail address that is valid and up-to-date and act as the single point of communication between ADOH/System Administrator and all other agency users.

System Management

Policy: Agency Administrators will assist, as needed, the System Administrator in report development and testing custom reports requested by the agency. Agency Administrators will also be responsible for disseminating all information to users within their agency.

Procedure: Agency Administrators will be made aware via e-mail from the System Administrator of all upcoming system and reporting changes. Agency Administrators are required to test and comment on all custom reports requested by the agency to the AZBOSCOC HMIS Help Desk at HMISsupport@CIR.org.

If a response from the Agency Administrator is needed, ADOH or the System Administrator will provide a deadline date for response, which will be no less than five (5) business days and no more than twenty (20) business days. The System Administrator will make the Agency Administrators aware when the final changes are implemented in the AZBOSCOC HMIS or ART reporting software. Agency Administrators will disseminate system and reporting changes to all other users within their agency within three (3) business days of final change.

Agency Management

Policy: The Agency Administrator(s) will be the sole user(s) able and responsible for updating, correcting and maintaining the provider information in the AZBOSCOC HMIS.

Procedure: Agency Administrators will have the privileges in the AZBOSCOC HMIS to change and update information regarding their agency and all projects for their agency. Agency

Administrators will verify this information quarterly and make changes as necessary. Failure to comply by maintaining correct agency and project information in the AZBOSCOC HMIS may result in suspension of all agency licenses until corrections are made.

Report Management

- Policy:** Agency Administrators are responsible for supplying the Executive Director or his/her designee with all required reports and/or information for verification and signature in a timely manner prior to submission.
- Procedure:** Agency Administrators will have knowledge and understanding of reports, due dates, submission dates and the appropriate person/agency for submission.

Training

- Policy:** Agency Administrators have been selected by the Executive Director or his/her designee as the staff member with the skills beyond that of a basic user. Agency Administrators will be required to attend a separate training at least one (1) time per year (twelve (12) months) or as needed/requested by ADOH.
- Procedure:** One (1) hour trainings will be scheduled throughout the calendar year by the System Administrator for Agency Administrators. The System Administrator may select topics in consultation with ADOH and/or based on evaluation of the AZBOSCOC HMIS FAQs on the Help Desk. Users are responsible for checking dates, times and class agendas on the System News in ServicePoint. Failure to comply with continuing education of the AZBOSCOC HMIS may result in suspension of the user's Agency Administrator status until requirements have been fulfilled.

User

A licensed AZBOSCOC HMIS user is responsible for ensuring their agency's client-level data is entered correctly and complies with all client rights, confidentiality and data sharing in compliance with COC regulations, standards, policies and procedures. Users will be assigned an appropriate user role in the AZBOSCOC HMIS.

Client-Level Data

- Policy:** Users will not knowingly enter false or misleading information under any circumstances into AZBOSCOC HMIS regarding the agency, project, or client.

Procedure: Users will submit all reports and/or information to the Agency Administrator/Executive Director for verification prior to submission to ADOH or the System Administrator. ADOH or the System Administrator will analyze and verify all data contained in reports and/or information prior to final submission and/or publication. If issues concerning client-level data are raised, the System Administrator may conduct an audit and ask ADOH for a monitoring site visit. Failure of an agency or user to comply or proof of violation can result in deactivation of the user's license permanently.

Ethical Data Use

Policy: Data contained in the AZBOSCOC HMIS will only be used to support the delivery of homeless and housing services. Each AZBOSCOC HMIS licensed user will affirm the principles of ethical data use and client confidentiality contained in the AZBOSCOC HMIS Policies and Procedures Manual and the AZBOSCOC HMIS Code of Ethics Form.

Procedure: Users will sign an AZBOSCOC HMIS Code of Ethics Form before being given access to the AZBOSCOC HMIS. Any individual or participating agency misusing, or attempting to misuse, the AZBOSCOC HMIS will be denied access. Without limitation the failure to comply with the policies and procedures related to the AZBOSCOC HMIS, may subject the agency to discipline and termination of access to the AZBOSCOC HMIS and/or termination of other ADOH contracts. Other funders will be notified by ADOH of failure to comply.

Data Sharing

Policy: At no time shall a licensed user alter, change or delete other agency's data when participating in data sharing agreements.

Procedure: If at any time, client data is in question/conflicting, the AZBOSCOC HMIS users **must**: 1) contact his/her own Agency Administrator and explain the data in question; and 2) either contact the agency that originally entered the data to receive clarification or ask the Agency Administrator to contact the agency that originally entered the data. If a resolution or conclusion cannot be reached between the two (2) users, the Executive Directors or designees of both agencies must come to a resolution regarding correct data entry. At any time, ADOH or the System Administrator can be requested, in written form, to analyze audit trails for investigative purposes. If a resolution cannot be determined by the Executive Directors or designees of both agencies, one will be determined by ADOH.

Client Release of Information

- Policy:** Users are the first to safeguard client privacy through compliance with client confidentiality and data sharing policies.
- Procedure:** Users in all agencies with the exception of those that provide services to Runaway and Homeless Youth must obtain a signed Client Acknowledgement Form for each client prior to entering data into AZBOSCOC HMIS. This can be a release or denial of sharing. If a client denies sharing, the user **must** contact ADOH or System Administrator prior to entering client-level data into the AZBOSCOC HMIS. The Client Acknowledgement Form and the Release of Information Form are in effect for one (1) year from the date of signing. Users **must** verify that the Release of Information entered into the AZBOSCOC HMIS has not expired for the project prior to entering client-level data into the AZBOSCOC HMIS or updating information in the AZBOSCOC HMIS. If the Client Acknowledgement and/or Release of Information has expired, the user **must** obtain a new release prior to updating records. Signed Release of Information forms **must** be secure and retained for five (5) years from the date of the last service for the client.

Initial Training

- Policy:** All new users must have training with the System Administrator before entering data into HMIS. The System Administrator and agency requesting new user access will determine training date(s) within forty-eight (48) hours of user request for access to the system. Training must be completed within thirty (30) days of requesting HMIS user status.
- Procedure:** System Administrator will conduct trainings each month of the calendar year, except December, for new users. Users must attend at least one (1) training prior to completing assigned tasks for course completion. If the user is unable to attend, a twenty-four (24) hour notice **must** be given to System Administrator. The System Administrator shall provide at least thirty (30) days advance notice of training opportunities. In some cases, shorter notice may be given in consultation with ADOH.

Continued Education Training

- Policy:** Users must attend at least one (1) AZBOSCOC HMIS Refresher Training course every year (twelve (12) months) to have the continuing skill set for data collection and reporting.

Procedure: ADOH and System Administrator will schedule training options throughout the year and publish information on the System News, as well as send notices directly to users. System Administrator shall provided at least thirty (30) days advance notice of training opportunities. In some cases, shorter notice may be given with consultation with ADOH.

Data Standards

Policy: Users must enter all data into the AZBOSCOC HMIS in accordance with the current HUD HMIS Data Standards and the ADOH Data Quality Policy and Procedures.

Procedure: Users must review and understand the most current HUD HMIS Data Standards and the HUD HMIS Data Standards: HMIS Data Dictionary available at <https://www.hudexchange.info/>. Users must review and understand the most current ADOH Data Quality Policies and Procedures available on the ADOH website at www.housing.az.gov. Failure to comply with these standards will result in the user's license being suspended by ADOH until further investigation or training can take place.

Clients

AZBOSCOC HMIS is a vehicle for information to be passed from agency to agency regarding client information, services, and referrals. The AZBOSCOC HMIS is geared to save clients time in re-telling their "story" and providing documentation. At no time should a client's rights, confidentiality or requests be violated.

Denial of Service

Policy: No client shall be denied a service for failure to release information for data sharing purposes or refusal to answer informational questions not required for service eligibility screening.

Procedure: Prior to collecting client-identifying information by the agency, clients **must** first sign the Client Acknowledge and Release of Information form, acknowledging their request to share or deny sharing of information. If the client is returning to the HMIS system after an absence of more than one (1) year, client data will be reviewed and updated.

Access to Data

Policy: Clients may have access to their data at any time and can ask for detailed explanation of the information given to them.

Procedure: Clients may request a printed report of their data in the AZBOSCOC HMIS from an agency. Requests for data must be made in writing. Agencies will **only** print and distribute information collected by their agency and not all the client's data entered by other agencies and stored in the AZBOSCOC HMIS. Agencies must comply with client's request within fourteen (14) business days. Clients can ask for and receive a verbal or written explanation of the report given to them by the agency within seven (7) business days of receipt. Clients may request, in writing and including a self-addressed envelope, a printed report from ADOH containing all their data in the AZBOSCOC HMIS. ADOH will have thirty (30) days to respond to such requests. Clients can ask for and receive a verbal or written explanation of the report given to them by ADOH within seven (7) business days of receipt.

Changing Information

Policy: Clients may request that agencies update incomplete and/or incorrect data. However, if an agency believes the request will result in inaccurate data, the agency may deny the request.

Procedure: If the agency chooses not to update the client's information, they must supplement their decision with additional information within the client notes section of the AZBOSCOC HMIS client record within seven (7) business days of request. Agencies **must** give a written explanation of the decision, which will be copied to the client's file within five (5) business days of decision. When an agency denies a client's request for updating their information, agencies must have a written explanation for refusal in client file within five (5) business days of denial.

Denial of Access

Policy: Agencies and ADOH reserve the right to deny a client's request to release his/her information if the information is being compiled in reasonable anticipation of litigation or comparable proceedings, contains personal information about another individual not related to the client and/or by disclosure would be reasonably likely to endanger the life or physical safety of any individual.

Educating Clients of Privacy Rights

Policy: The client intake worker, user or case worker will work with the clients to understand their privacy rights, benefits of sharing data and what their data is used for once entered into the AZBOSCOC HMIS.

Procedure: The Executive Director or his/her designee will ensure that a “Privacy Notice” is posted in an area that is clearly visible to the client. The client must be informed of his/her rights under the privacy policy and should receive a copy of the policy, if requested. The client intake worker, user and case worker will be knowledgeable regarding data sharing policies, release of information policies and how to enter client-level data at the right confidentiality level in the AZBOSCOC HMIS. ADOH is not liable for client-level data that has been entered into the AZBOSCOC HMIS by a user in which the client’s right to privacy was violated.

Communication

From ADOH and System Administrator

- Policy:** ADOH is responsible for relevant and timely communication with each participating agency, regarding all aspects of the AZBOSCOC HMIS, reporting and data standards. All users **must** provide contact information to receive HMIS communication.
- Procedure:** Neither ADOH nor the System Administrator is responsible for a participating agency's loss of funds due to their negligence in adhering to any updated regulations regarding reporting and data collection. General system and training communications from ADOH and/or the System Administrator will be directed to all persons enrolled in ADOH's HMIS End User distribution list. General communications from ADOH and/or System Administrator will be sent through e-mail communication. Specific communications will be addressed to the person or people involved by direct e-mail communication. For emergency situations, communications will be directed through direct e-mail and the ServicePoint News system located on the home screen of the AZBOSCOC HMIS.

All FAQs, tip sheets, documentation, policies, procedures, reporting matrix and general help will be located on the ADOH website, www.azhousing.gov, the System Administrator website, www.211Arizona.org, and the home screen of the AZBOSCOC HMIS. Agency Administrators are responsible for distributing that information to any additional users at their agency who may need to receive it, including, but not limited to, Executive Directors, client intake workers and data entry specialists.

To ADOH and/or System Administrator

- Policy:** Users are encouraged to submit HMIS questions through the HMIS help desk, HMISsupport@CIR.org. Questions regarding Code of Ethics agreements, Agency Profile forms and Agency Partnership Agreements should be submitted to ADOH, anne.scott@azhousing.gov. Special reports requiring the System Administrator to adapt or create a report within ServicePoint must be submitted through the ADOH.
- Procedure:** To receive the best customer service from the System Administrator, agencies are encouraged to utilize the help desk at HMISsupport@CIR.org or call the help desk at (602) 908-3605. The goal of ADOH and the System Administrator is to respond to all needs within one (1) business day of first contact.

AZBOSCOC HMIS Help Desk

- Policy:** The System Administrator maintains Help Desk support for assistance on requests including report issues, requests for system enhancements, technical support, helpful hints, training tips, documentation to download, password reset requests, etc.
- Procedure:** The HMIS Help Desk is available from 9:00 a.m. to 5:00 p.m., Monday through Friday, excluding ADOH holidays. Help requests will be addressed in the order of receipt. Help requests will be addressed within twenty-four (24) business hours. All Help Desk requests received after 4:30 p.m. may be addressed the next business day. To receive the most complete response, requests asking for help to identify or resolve issues with reports **should** have the report in question attached to the request. Submission of reports to project representatives will not be accepted through the Help Desk.

Access

ADOH and System Administrator

- Policy:** ADOH and the System Administrator will have access to retrieve all data in the AZBOSCOC HMIS. ADOH and the System Administrator will not access individual client-level data for purposes other than direct client service-related activities, coordinated assessment, referral, reporting and maintenance, checking for data quality and responding to Help Desk requests.
- Procedure:** ADOH will be responsible for ensuring that no individual client data is retrieved for purposes other than direct client service, reporting, system maintenance, performing data quality checks and responding to Help Desk requests. ADOH will oversee all reporting to HUD and the public.

All special research requests must be approved by ADOH in coordination with requesting agency. Reports necessary for funding agreements (Annual Performance Reports, Consolidated Annual Performance and Evaluation Reports) may be run at the request of the agency or the request of a federal or state partnering agency. Reports containing system-wide information or county/regional information must receive prior approval by ADOH before System Administrator runs and/or provides the report.

Agency Administrators

- Policy:** Agency Administrators will have the ability to access client-level data in all of their agency projects.

Procedure: Participating agency's designated Agency Administrator will have the ability to locate, change, add or remove client-level data from their agency's projects. The Agency Administrator will be able to generate reports for all of their agency's projects. The Agency Administrator will have access to the Annual Homeless Assessment Report. The Agency Administrator will have access to the Provider Information Profile section of the AZBOSCOC HMIS and will have the ability to change information located within their agency's projects.

User Access

Policy: AZBOSCOC HMIS System Administrator will assign the most restrictive security settings to all other users not assigned as an Agency Administrator by the Executive Director.

Procedure: AZBOSCOC HMIS System Administrator, in consultation with the agency Executive Director, will assign appropriate user levels when adding or changing user access. Users will not have the ability to delete or change another project's client-level data. Users will not always have the ability to generate reports for any and all agency projects based on types of user roles. AZBOSCOC HMIS System Administrator will always assign the most restrictive access which allows efficient job performance in the interest of client security.

Public Access

Policy: ADOH, under the direction of the ADOH Legal Department, will address all requests for data from entities other than participating AZBOSCOC HMIS. The public is not given access at any time.

Procedure: The AZBOSCOC HMIS can enter into data sharing agreement with outside organizations under contract with ADOH for:

- Research
- Data Matching
- Evaluation of Services/Planning.

Contracts must include a Data Sharing Agreement. Data Sharing Agreements will require that all parties certify that they will adhere to the strict standards of protecting client-level data employed by the AZBOSCOC HMIS. All AZBOSCOC HMIS-participating agencies will be notified in writing if and when ADOH is considering a contract with an outside organization at least thirty (30) days prior to execution of the contract. All public requests for information must be made in writing to ADOH.

ADOH will issue periodic public reports and aggregate data about homelessness and housing issues with no previous notice to participating AZBOSCOC HMIS agencies. Such public reports will not reveal identifying information about clients.

Security

Bowman Systems

System Security

Policy: ServicePoint is supported by the most powerful system security measures available. Using 128-bit encryption, user authentication, and user access levels, ServicePoint ensures that data is protected from intrusion.

Procedure: Bowman Systems' employees, who have access to client-level data, are subject to a national background check, training on confidentiality requirements and must sign a confidentiality statement as part of their employee agreement. The system function logs the time and type of activity, as well as the name of the user who viewed, added, edited or deleted the information.

Servers are located in complexes with:

- Twenty- four (24) hour security personnel.
- Twenty- four (24) hour video surveillance.
- Dedicated and secured Data Center.
- Locked down twenty- four (24) hours per day.
- Only accessible by management-controlled key.
- No access is permitted to cleaning staff.
- State-of-the-art HVAC and fire suppression system.

Data Security

Policy: Bowman Systems ensures availability of customer data in the event of a system failure or malicious access by creating and storing redundant records. All data going across the Internet to the user's Web browser uses AES-256 encryption in conjunction with RSA 2048-bit key lengths.

Procedure: The traffic that flows between the server and the user's workstation is encrypted using the SSL certificate installed on ADOH's dedicated server. Database tape backups are performed nightly. Tape backups are maintained in secure offsite storage. Seven (7)

days' backup history is stored on instantly accessible Raid 10 storage. One (1) month's backup history stored offsite. Users have twenty-four/seven (24/7) access to Bowman Systems emergency line to provide assistance related to outages or downtime.

Unauthorized Access

- Policy:** If an unauthorized entity were to gain access to the AZBOSCOC HMIS and client data, or if there were suspicion of probable access, the System Administrator and Bowman Systems will take immediate action to protect the security of the system. Bowman Systems will adhere to the "Securing Client Data" manual (Attachment D).
- Procedure:** The system would be examined to determine the presence of system or data corruption. If the system has been compromised, the system would be taken offline. Using the previous night's backup, a restored copy of the system data would be loaded onto another server and the system brought back online with the back-up copy. Comparing the back-up database to the database taken offline, an investigation would be launched to determine the extent of the unauthorized activity/corruption and the corrective action needed. Upon completion of the investigation, findings would be reported to ADOH and options would be discussed. Upon ADOH's approval, corrective action would be initiated. Corrective action could include all or part of the following:
- The original hard drive would be completely erased and rebuilt, including a new operating system, SSL Certificate, applications and the back-up database.
 - If applicable and feasible, lost data from the original database would be restored.

If Bowman Systems or its employees are determined to be at fault for unauthorized access, ADOH may terminate the ServicePoint License and Service Agreement and pursue legal remedies.

Licensed Users

A licensed user is a person who has signed and submitted an AZBOSCOC HMIS Code of Ethics Agreement and it is still in effect for the current year. When the System Administrator was not notified of their termination from the agency within twenty-four (24) hours of termination, neither Bowman Systems, ADOH, nor the System Administrator will be liable for actions of a former agency employee with an active license. The Agency shall be liable and ADOH may terminate access to the AZBOSCOC HMIS and/or terminate ADOH contracts if it determines that the Agency acted carelessly in managing their licensed users.

User Access

Policy: The System Administrator will provide unique usernames and initial passwords to each licensed user. Usernames and passwords may not be exchanged or shared with other users.

Procedure: The System Administrator will provide directly to the user a unique username and initial password upon completion of training requirements as stated in this manual. ADOH will have access to the list of usernames. ADOH will perform an annual user audit for invoicing and licensing purposes. The sharing of usernames will be considered a breach of the AZBOSCOC HMIS User Agreement and the Partnership Agreement. Exchanging usernames seriously compromises security and accountability to clients. If a breach occurs, it may subject the agency to discipline and termination of access to the AZBOSCOC HMIS and/or termination of other ADOH contracts.

Passwords

Policy: Users will have access to the AZBOSCOC HMIS via a username and password. Passwords will be reset every forty-five (45) days. Passwords must consist of at least eight (8) characters and include at least two (2) digits. Users must keep passwords confidential.

Procedure: On the forty-fifth (45th) day when the user logs in, the system will require the user to create a new password and enter it twice before accessing the database.

The sharing of passwords will be considered a breach of the AZBOSCOC HMIS User Agreement. If a breach occurs, ADOH may subject the agency to discipline and termination of access to the AZBOSCOC HMIS and/or termination of ADOH contracts.

Password Recovery

Policy: Agency Administrators may reset passwords. If the Agency Administrator is unavailable or otherwise unable to reset a password for an end user, ADOH or the System Administrator will reset a user's password in the event the password is forgotten.

Procedure: Users must request a password reset by submitting a request to the AZBOSCOC HMIS Help Desk at HMISsupport@cir.org or by calling the Help Desk at (602) 908-3605 or contacting ADOH at anne.scott@azhousing.gov or (602) 771-1017.

ADOH or the System Administrator will verify the user is active in the system prior to resetting a password. The reset information will be sent back to the user via the Help Desk or ADOH. The user must enter the password given. The system will only accept this password one time. The system will require the user to create a new password and enter it twice before accessing the database.

Location of Data Access

Remote Access

Policy: Users will ensure the confidentiality of client data, following all security policies in the AZBOSCOC HMIS Policies and Procedures Manual and adhering to the standards of ethical data use, regardless of the location of the connecting computer. The Executive Director has the responsibility to assure the user is in compliance with this and all other policies, procedures, agreements and rules governing the AZBOSCOC HMIS.

All users that access the AZBOSCOC HMIS remotely must meet the standards detailed in the security policies and procedures and may only access it for activities directly related to their job. Users may not access the system from unsecured networks (for example: coffee shops, restaurants, libraries and other public places).

Examples of Remote Access:

- Personal laptops that were not purchased by the agency.
- Access to the AZBOSCOC HMIS on a network other than that of the agency.
- Private home desktops.

Procedure: ADOH may annually audit remote access by AZBOSCOC HMIS users. If a user is found to have accessed the AZBOSCOC HMIS through an unsecured network, the user license will be immediately suspended. ADOH may impose additional sanctions on the agency including termination of access to the AZBOSCOC HMIS and/or termination of ADOH contracts.

Agency Data

Data Retrieval

Policy: AZBOSCOC HMIS-participating agencies will have access to retrieve any individual client-level data and aggregate data for their own projects. Participating agencies will

not have access to retrieve client-level or aggregate data for other participating agencies or system-wide.

Procedure: Agency Administrators using the ServicePoint Report Writer or ART will only be able to extract data from those records to which they have access based on their level of security given by ADOH and/or the System Administrator. Whenever a user attempts to access an aggregate report for an unauthorized agency, the report will show “0”. Both Report Writer and ART will limit the user access and only report data from records to which the individual user has access.

Extracted Data

Policy: AZBOSCOC HMIS-participating agencies have access to retrieve any individual client-level data and aggregate data for their own projects and download the information onto a local storage vessel. Users will maintain the security of any client data extracted from the database and stored locally, including data used in custom reporting.

Procedure: Any data printed or downloaded from AZBOSCOC HMIS is protected data and should be held in secured paper or electronic files. All extracted data falls within the same confidentiality procedures as electronically-stored data. ADOH and the System Administrator are not responsible for breaches in data once removed from the AZBOSCOC HMIS. If a licensed user extracts data, the participating agency for which the licensed user works is responsible for any data breach on data extracted by the user.

Compliance Security Review

Policy: AZBOSCOC HMIS-participating agencies are subject to random or scheduled compliance monitoring checks completed by ADOH.

Procedure: All agencies will be desk-monitored at least once a year for security risks and compliance with documentation. On-site monitoring will be conducted at least once yearly for agencies under contract with ADOH. Agencies not under contract with ADOH will be monitored if they are deemed to be a high or medium security risk based on the annual desk monitoring.

AZBOSCOC HMIS Data Sharing

Agencies are able to share client information with agencies outside of their network with appropriate client authorization. The AZBOSCOC HMIS is a vehicle through which agencies can share data

outside of their own agency and network. Statewide reporting is based on aggregate, non-identifying data; therefore, aggregate, non-identifying data may be shared with the public without specific permission. These policies would be made clear to clients as part of the Client Acknowledgement and Release of Information form. To comply with coordinated assessment required by HUD, AZBOSCOC will share the VI-SPDAT and the VI-F-SPDAT with all AZBOSCOC participating agencies. ADOH will require that agencies attend training on the use of the VI-SPDAT and the VI-F-SPDAT.

Opt-In

Policy: All agencies and projects, with exception of HOPWA, domestic violence service providers and those that fall within Federal Regulation 42 CFR Part 2 (those that receive federal funds for substance abuse treatment services as a licensed treatment facility), may share client-level data with other AZBOSCOC HMIS-participating agencies by executing a written and approved Data Sharing Agreement (Attachment E). A copy of the Data Sharing Agreement must be on file with the agencies wishing to share data and with ADOH.

Procedure: The participating agency's Executive Director is responsible for ensuring that all licensed users within the agency abide by all the policies and procedures stated within all signed documents including the Data Sharing Agreement. Each participating agency will retain a copy of the agreement and a master will be filed with ADOH. All clients must have a valid Client Acknowledgement and Release of Information form in their case file prior to users entering client-level data into the AZBOSCOC HMIS to indicate either approval or denial of sharing their data.

Opt-Out

Policy: Agencies can request to be removed from data sharing. ADOH reserves the right to deny a request to opt-out of data sharing.

Procedure: Any agency Executive Director wishing to opt-out of data-sharing must execute an AZBOSCOC HMIS Data Sharing Exit Agreement (Attachment F). ADOH will make a final decision within seven (7) business days of receipt of agreement.

If approved:

1. Agency will retain a copy of the agreement and a master will be filed with ADOH.
2. The System Administrator will remove the data sharing privileges within three (3) days of approval.

3. Once data sharing is removed, agency users will no longer be able to grant permission based on appropriate client consent to share individual client information.
4. Authorized, licensed users will only be able to view their own agency's client data.
5. The client's ID, name, year of birth and Social Security Number, alias, will remain at a global sharing level to limit duplicate clients in the system.

If denied:

1. Agency will retain a copy of the agreement and a master will be filed with ADOH.
2. Agencies can appeal the decision to the ADOH Legal Department in a written statement within three (3) business days from receipt of decision.

Visibility Settings

Policy: All data sharing policies will be enforced by ADOH.

Procedure: Each user's access to data will be defined by their user type, as described in the Access section of this manual. ADOH will conduct at least annual file checks for appropriate client authorization. The System Administrator will conduct quarterly user audit reports and submit reports to ADOH.

Client Denial to Share

Policy: If the client chooses not to have their data shared with other agencies and the agency participates in data sharing, the data **must** be locked in the system to restrict visibility to the agency which originally entered the information.

Procedure: The user **must** contact the AZBOSCOC HMIS Help Desk prior to entering client-level data into the AZBOSCOC HMIS. The System Administrator is responsible for directing users how to lock client-level data with the correct visibility security settings. ADOH will monitor for client denial to share in desk-monitoring and on-site monitoring.

Scanned Document Management

Policy: ADOH is responsible for organization and management of the AZBOSCOC HMIS. It is necessary to follow standardized procedures to upload documents to ensure uploaded information is useable system-wide.

Procedure: Documents uploaded to a client must have the naming standards of:

- Client ID#, Document Title, Date Saved
 - ✓ Example: 123456, Homeless Verification, 11/20/2013

File attachments may only be uploaded to the client profile screen under “File Attachments”. Users may never remove documents of another agency and may only remove theirs when uploading an updated version. Unless otherwise noted by client denial, all file attachments will be shared by agencies sharing data.

Data Shared Information

Policy: The sharing standard for each area of AZBOSCOC HMIS data entry is set forth below. At any time, ADOH may choose to close or share a section of the data entry for privacy protection or coordinated assessment needs. The intent of the AZBOSCOC HMIS is to allow as much data sharing as appropriate and necessitated by clients’ needs and services provided to meet those needs.

Procedure: The following assessments are currently set to share with all participating AZBOSCOC HMIS projects with Data Sharing Agreements. Some data elements may be related to the service provided by an agency (case notes, case plans, etc.) and participating agencies may choose not to share those elements.

- Assessments
- Case Manager
- Case Notes
- Case Plan
- File Attachments
- Household Data
- Interim/Annual Assessments
- Needs
- Referrals
- Self-Sufficiency Matrix
- Services
- Shelter Bed Information
- SPDAT/F-SPDAT
- Universal Data Elements
- VI-SPDAT/VI-F-SPDAT

The following assessments are currently set to share with only with the agency, regardless of how the project is listed. Data at no time is shared outside the agency.

- HOPWA Projects

Data Quality

The data standards established by HUD and ADOH are applied to all projects reporting client-level data in the AZBOSCOC HMIS. At no time do standards increase or decrease with the source of funding for the project. To have correct, accurate and reliable reporting in a timely manner, all projects **must** adhere to the policies and procedures established. Please refer to the Arizona Balance of State Continuum of Care Data Quality Plan available on the ADOH website at <https://housing.az.gov/general-public/special-needs-assistance?ID=530&CID=16> (scroll down to Homeless Management Information System) and the HMIS Data Standards Manual and HMIS Data Standards: HMIS Data Dictionary available on the HUD website <https://www.hudexchange/info/>.

License Suspension and/or Replacement

Policy: At any time, ADOH reserves the right to suspend a user's license if a user is having difficulty entering client-level data and providing accurate reports. ADOH and the System Administrator can recommend and require the Executive Director to assign a different staff member or volunteer to attend training and enter client-level data.

Violation of Data Quality and Integrity

Policy: In its discretion, ADOH may hold funds or deduct points on future grant applications for agencies that violate the data quality policies and procedures.

Procedure: Such action will be conducted in accordance with the ADOH AZBOSCOC Policies and Procedures Manual.

Licensing and Invoicing

To carry out its responsibilities as the Lead Agency for the AZBOSCOC HMIS, ADOH has secured funding through the COC project funds. By seeking to maximize these resources, ADOH has been able to provide ServicePoint to BOS COC user free of charge and keep fees at an affordable level to partnering agencies. Agencies that receive federal funds and are required through their funding agency to participate in AZBOSCOC HMIS but do not receive funds through the AZBOSCOC may be

required to pay license fees and a nominal data collection fee to help cover the costs of handling data that is analyzed and combined with AZBOSCOC HMIS data for reporting.

Annual Invoice

- Policy:** ADOH will send an invoice to each Executive Director of each agency or the appropriate staff at a partnering federal or state agency.
- Procedure:** Notices will be sent via email and/or postal service. Payments are due within thirty (30) days of receipt of invoice. Late fees may be assessed. Non-payment licenses may be suspended by ADOH. ADOH will make all project representatives aware of agencies that have had their user licenses suspended. All grant funds may be held for all components until payment is made to ADOH, if applicable.

Pro-Rated License

- Policy:** Executive Directors will be invoiced on a pro-rated basis for users that are licensed during the calendar year.
- Procedure:** ADOH will use the following formula to determine the amount that should be charged for the license:
- Total price/12 = price per month;
 - Price per month x number of full months remaining in the year = price for pro-rated balance of year;
 - Count the number of days left in the month;
 - Price per month/number of days in month = price per day;
 - Number of days left in month x price per day = price for that pro-rated month;
 - Price for pro-rated month + price for pro-rated balance of year = total of user license.

Payment **must** be received by ADOH within thirty (30) days of activation. If the payment is not received, the new user license may be suspended by ADOH. ADOH reserves the right to mandate follow-up training for the new user prior to reactivation.

Grievances

From a Participating Agency or Client to ADOH or the AZBOSCOC HMIS

- Policy:** AZBOSCOC HMIS-participating agencies have the right to file a grievance against ADOH. Clients have the right to file a grievance against a participating agency regarding the AZBOSCOC HMIS.

Procedure: ADOH will respond within thirty (30) days to complaints from families, owners, employees and members of the public. All complaints must be submitted in writing and will be documented.

- Categories of Complaints
 - ✓ Complaints from clients: a client disagrees with an action or inaction of ADOH or System Administrator.
 - ✓ Complaints from participating agencies or other HUD-funded programs: an AZBOSCOC HMIS-participating agency, a HUD-funded program or other federal-funded program disagrees with an action or inaction of ADOH and/or System Administrator.

The complaining party will submit the complaint in writing to ADOH's Special Needs Programs Administrator within seven (7) business days of the date of occurrence. It is ADOH's objective to resolve disputes at the lowest level possible and to make every effort to avoid the most severe remedies. However, if this is not possible, ADOH will ensure that applicants and participants will receive all of the protections and rights afforded by the law and applicable regulations.

Participation Termination

Initiated by the Participating Agency

Policy: The termination of the AZBOSCOC HMIS Partnership Agreement by the participating agency will affect other contractual relationships with ADOH. In the event of termination of the AZBOSCOC HMIS Partnership Agreement, all data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS and the records will retain their original security settings.

Procedure: HUD-funded agencies are required to participate in the AZBOSCOC HMIS or a comparable database as a condition of their funding. For those that are terminating their contract with the AZBOSCOC HMIS, this will be addressed in the context of the larger Agency Grant Agreement by ADOH. For those participating agencies that are non-HUD-funded, the person signing the initiating AZBOSCOC HMIS Partnership Agreement will notify ADOH with a date of termination in writing. In all cases of termination of the AZBOSCOC HMIS Partnership Agreement, the System Administrator or ADOH will deactivate all users from the agency on the date of termination stated by the agency. All client-level data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS and the records will retain their original security settings.

Initiated by ADOH

Policy: ADOH will terminate the AZBOSCOC HMIS Partnership Agreement for non-compliance with the terms of that agreement.

Procedure: HUD-funded agencies are required to participate in the AZBOSCOC HMIS or a comparable database as a condition of their funding. For those that are terminated, this will be addressed in the context of the larger Agency Grant Agreement by ADOH. For those participating agencies that are non-HUD-funded, ADOH will notify the person signing the initiating AZBOSCOC HMIS Partnership Agreement with a date of termination in writing. ADOH will give thirty (30) days written notice to the agency, regardless of funding source, to the attention of the person who initiated the agreement. ADOH requires any AZBOSCOC HMIS violations to be rectified before the AZBOSCOC HMIS Partnership Agreement termination is final. ADOH may also terminate the AZBOSCOC HMIS Partnership Agreement without cause upon thirty (30) days written notice to the participating agency. The termination of the AZBOSCOC HMIS Partnership Agreement may affect other contractual relationships with ADOH.

In all cases of termination of the AZBOSCOC HMIS Partnership Agreement, System Administrator will make inactive all users from the agency on the date of termination. All client-level data entered into the AZBOSCOC HMIS will remain an active part of the AZBOSCOC HMIS, and the records will retain their original security settings.

Projects in AZBOSCOC HMIS

Adding a New Project in AZBOSCOC HMIS by Participating Agency

Policy: The Executive Director or his/her designee will notify the System Administrator and ADOH thirty (30) days prior to implementation of a new project.

Procedure: At least thirty (30) days prior to anticipated implementation date, the Executive Director or his/her designee will submit an Agency Profile form to ADOH. Being a newly-added project in the AZBOSCOC HMIS, System Administrator will ensure the following standard formula is used when creating a name within AZBOSCOC HMIS:

- Parent Agency - Project Name - Funding Source - Type of Service - COC
✓ Example: *Johnson County CAP - Joe's House Step Two – COC – TH - BOS*

System Administrator will present the completed request form and recommended program name to the ADOH for approval.

Making Changes to Existing Projects in AZBOSCOC HMIS

Policy: The Executive Director or his/her designee will notify ADOH of programmatic changes.

Procedure: The Executive Director or his/her designee will notify ADOH of any applicable programmatic changes to existing programs which may have an effect on data collection, data entry, data quality or data reporting at least forty-five (45) business days prior to the implementation date of the change. Recommendations and timelines for the changes will be returned to the participating agency no more than ten (10) business days from receipt date of request. The System Administrator will complete changes at least seven (7) business days prior to the implementation date for final approval from the participating agency.

Additional Customization

Policy: The participating agency will be solely responsible for additional database customization costs. This includes the voluntary transfer of existing grant client-level data and custom build reports beyond that of the System Administrator's scope of work.

Procedure: The Agency Administrator or Executive Director will notify ADOH of any applicable programmatic customization which may have an effect on data collection, data entry, data quality or data reporting at least forty (40) business days prior to the implementation date of the change. Proposed customization and/or changes must be submitted in writing.

If support from Bowman Systems is necessary to make the changes, ADOH and/or the System Administrator will communicate to Bowman the needs and scope of work for the participating agency. Recommendations and timelines for the changes will be returned to the participating agency no more than ten (10) business days from receipt date of request, including a Statement of Work from Bowman, if applicable. The System Administrator will complete changes at least seven (7) business days prior to the implementation date for final approval from the participating agency. If a participating agency voluntarily transfers an existing grant to another agency, ADOH will not pay for client-level data to be transferred. The agency requesting the transfer will be liable for any fees incurred.

Acknowledgement of Receipt of the AZBOSCOC HMIS Policies and Procedures Manual

By signing this form, you acknowledge receipt of the AZBOSCOC HMIS Policies and Procedures Manual from Arizona Department of Housing (ADOH). Your signature further certifies that you have read, understand and will abide by the policies and procedures, as detailed in this document, as well as accept any measures taken for violation of these practices. Please note, the AZBOSCOC HMIS Policies and Procedures Manual is subject to change.

Signature of Licensed User

Print Name

Date

Signature of Executive Director

Printed Name of Executive Director

Date

Return signed form to ADOH:

Via e-mail:

anne.scott@azhousing.gov

Via mail:

Arizona Department of Housing
Attn: Anne Scott
1110 West Washington Street, #310
Phoenix, AZ 85007

ATTACHMENT A

Agency Partnership Agreement

This agreement is entered into on the _____ day of _____, 20__ between Arizona Department of Housing, hereafter known as “ADOH,” and _____ (agency name), hereafter known as “Participating Agency,” regarding access and use of the Arizona Balance of State Continuum of Care Homeless Management Information System, hereafter known as the “Arizona BOSCOH HMIS.”

I. Introduction

The Arizona BOSCOH HMIS, a shared homeless database, allows authorized personnel at Participating Agencies throughout the geographic area of the thirteen less populated Arizona counties (excluding Maricopa and Pima Counties) to input, use, and receive information concerning their own clients and to share information, subject to agreements, on common clients.

Arizona BOSCOH HMIS goals include:

- a) Improved coordinated care for and services to people experiencing homelessness in Arizona
- b) Automated processes to replace manual processes (when practical)
- c) Meeting reporting requirements including U.S. Department of Housing and Urban Development (HUD) and non-HUD reports
- d) Minimally impacting automated systems of current participating agencies
- e) Complying with all state and federal requirements regarding client/consumer confidentiality and data security (HIPAA, etc.)
- f) Delivering timely, credible, quality data to the community
- g) Expansion to include new participating agencies
- h) HMIS participation by all homeless providers in the Arizona BOSCOH geographic area
- i) A user-friendly system for participating agencies and clients

The ADOH administers the Arizona BOSCOH HMIS, contracts for an agency to house the HMIS database central server and limits Participating Agency access to the HMIS database. Utilizing a variety of methods¹, ADOH intends to protect, to the utmost of its ability, the Arizona BOSCOH HMIS data from accidental or intentional unauthorized modification, disclosure, or destruction. Designed to benefit multiple stakeholders², the Arizona BOSCOH HMIS, when used correctly and faithfully, will improve knowledge about the services and service needs of people experiencing homelessness and may result in a more effective and efficient service delivery system.

¹ See Bowman Service Point manual for further information

² Participating agencies, people experiencing homelessness, HUD, the Arizona BOSCOH Regional Steering Committee and the Continuum members, fund providers, and the community

II. Confidentiality

- A. The Participating Agency will uphold relevant federal and state confidentiality regulations and laws that protect client records and will only release confidential client records with written consent by the client³, or the client's guardian⁴, unless otherwise provided for in regulations or laws.
1. The Participating Agency will abide specifically by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2, regarding disclosure of alcohol and/or drug abuse records. In general terms, the federal regulation prohibits the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Participating Agency understands the federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
 2. The Participating Agency will abide specifically, when applicable, with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and corresponding regulations passed by the Federal Department of Health and Human Services. In general, the regulations provide consumers with rights to control the release of medical information, including the right: to give advance consent prior to disclosures of health information; to see a copy of health records; to request a correction to health records; to obtain documentation of disclosures of health information; to obtain an explanation of privacy rights and to be informed about how information may be used or disclosed. The current regulation provides protection for paper, oral and electronic information.
 3. The Participating Agency will abide by Arizona State Laws and Federal Laws related to confidentiality and security of medical, mental health and substance abuse information as found in Arizona Revised Statutes Title 12, Arizona Revised Statutes Title 36, 42 CFR Part 2 and other relevant statutes, rules and regulations.
 4. The Participating Agency will provide a verbal explanation of the Arizona BOSCO HMIS and arrange, when possible, for a qualified interpreter or translator for an individual not literate in English or having difficulty understanding the consent form(s).
 5. The Participating Agency will not solicit or input information from clients into the Arizona BOSCO HMIS unless specific information proves essential to provide services, to develop reports and provide data, and/or to conduct evaluations and

³ Anyone who receives services from an agency

⁴ Anyone legally in charge of the affairs of a minor or of a person deemed incompetent, according to the laws of the State of Arizona. All references to "client" in this Agreement also apply to "client's guardian."

research. Evaluation and research will only use de-identified client data except in the case when the Participating Agency evaluates and researches its own clients. In all cases, the Participating Agency shall maintain compliance with all state and federal laws regarding research, evaluation and confidentiality of individual client identities.

6. If a Human Subjects Review Committee or similar committee exists within the Participating Agency, then the Participating Agency, wishing to conduct evaluation or research, must submit its request and be approved by that committee prior to conducting the evaluation or research.
 7. The Participating Agency will not divulge any confidential information received from the Arizona BOSCOH HMIS to any organization or individual without proper written consent by the client (or guardian where appropriate) unless otherwise permitted by relevant regulations or laws.
 8. The Participating Agency will ensure that every person issued a User Identification and Password to the Arizona BOSCOH HMIS will comply with the following:
 - a. Read and abide by this Partnership Agreement
 - b. Obtain, read and abide by the Arizona Department of Housing HMIS Policies and Procedures manual⁵
 - c. Read and sign a HMIS Code of Ethics form⁶ stating an understanding of, and agreement to comply with, Arizona BOSCOH HMIS confidentiality practices
 - d. Create a unique User I.D. and password; and will not share or reveal that information to anyone by written or verbal means
 9. The Participating Agency understands that individuals granted Agency Administrator access within each agency must become a Designated Arizona BOSCOH HMIS Agency Administrator through specific training provided by the System Administrator.
 10. The Participating Agency understands that all client information will be encrypted⁷ on a file server physically located in a locked office with controlled access, at the offices of Bowman Internet Systems, LLC located at 333 Texas Street, Suite 300, Shreveport, Louisiana 71101.
- B. The Participating Agency agrees to document, via a signed Arizona BOSCOH HMIS Client Acknowledgement form, a client's (or guardian's when appropriate) understanding and

⁵ The HMIS Policies and Procedures Manual is available on the ADOH website www.housing.az.gov.

⁶ See Code of Ethics form

⁷ See Bowman Service Point Manual for encryption specifications

consent to enter client information into a central database and the reasons for this entry. Furthermore,

1. An individual client (or guardian) must give informed client consent by understanding and signing the Client Acknowledgement Form prior to the Participating Agency sharing any client information with another agency.
2. The completed Client Acknowledgement form provides:
 - a. Informed client consent regarding basic identifying client data to be entered into a shared database
 - b. Release of non-confidential service transaction information to be shared for report purposes.
 - c. Client release to authorize the sharing of client identifying information among designated Arizona BOSCOH HMIS Participating Agencies.
3. If a client denies authorization to share basic identifying information and non-confidential service data via the Arizona BOSCOH HMIS, the Client Profile section within ServicePoint will be “locked” so that other Participating Agencies will not see the client’s data.
4. The Participating Agency will name the Arizona BOSCOH HMIS in any existing Participating Agency Release of Information form(s). If the Participating Agency intends to share confidential client data within the Arizona BOSCOH HMIS, the Participating Agency will communicate to the client what information, beyond basic identifying data and non-confidential services, will be shared. The Participating Agency will communicate to the client that while the Participating Agency can restrict information to be shared with select agencies, other agencies will have access to the information and are expected to use the information professionally and to adhere to the terms of the Arizona BOSCOH HMIS Partnership Agreement. Agencies with whom information is shared are each responsible for obtaining appropriate consent before allowing sharing of client records.
5. Each Participating Agency is responsible for ensuring that its staff and users comply with the requirements for informed consent and client confidentiality. The ADOH⁸ will ensure and conduct periodic monitoring and reviews with Participating Agencies to enforce informed consent standards, including:
 - a. Appropriate documentation indicating client awareness and consent of data being entered into central database
 - b. Consent to release certain information.

⁸ The ADOH may conduct these reviews or may accept a similar review by another organization as evidence of Participating Agency compliance.

6. The Participating Agency agrees to place all Client Acknowledgement forms related to the Arizona BOSCOH HMIS in a the client's file to be located at the Participating Agency's business address and that such files be made available to the ADOH for periodic audits. The Participating Agency will retain these Arizona BOSCOH HMIS related Client Authorization for Release and Exchange of Basic Information forms for a period of five years upon expiration, after which time the forms will be discarded in a manner ensuring un-compromised client confidentiality.
7. The Participating Agency understands that in order to update, edit, or print a client's record, the Participating Agency must have on file current client authorization as evidenced by a completed standard Arizona BOSCOH HMIS Client Acknowledgement form pertaining to basic identifying data.

The Participating Agency agrees to enter the minimum data required in the Arizona BOSCOH HMIS; however, this does NOT mean that a Participating Agency is required to share client identifiable information. A client's information may be restricted to overall access when the client refuses to allow his/her name, social security number or other personally identifiable information to be shared in the database.

- C. The Participating Agency and ADOH understand that the Arizona BOSCOH HMIS and the ADOH are custodians of data, and not owners of data.
 1. In the event the Arizona BOSCOH HMIS ceases to exist, the ADOH will notify Participating Agencies and provide a six month time period for the Participating Agencies to access and save agency specific client data, statistical data and frequency data from the entire system. Then, the centralized server database will be purged or stored. If the latter occurs, the data will remain in an encrypted and aggregate state.
 2. In the event the ADOH ceases to operate the Arizona BOSCOH HMIS, another organization will administer and take custodianship of the data. The ADOH or its successor Agency will inform, in a timely manner, all Participating Agencies.
 3. If the Participating Agency ceases to exist, it shall notify and work with the ADOH to determine the appropriate disposition of Participating Agency's data, including the transfer of the data to a successor agency.
 4. If the Participating Agency chooses to withdraw from the Arizona BOSCOH HMIS, the Participating Agency shall notify the ADOH of intended withdrawal date. The ADOH shall allow sixty days for the Participating Agency to access and save agency specific client data, statistical data and frequency data from the entire system. The Participating Agency is financially responsible for extracting its data.

5. In the event Bowman Systems ceases to exist, the ADOH will notify Participating Agencies in a timely manner of the expected result of this event.

III. Data Entry and/or Regular Use

- A. User Identification and Passwords are not permitted to be shared among users.
- B. If a Participating Agency has access to a client's basic identifying information, non-confidential service transactions and confidential information and service records, it will be generally understood that a client gave consent for such access. However, before a Participating Agency can update, edit, or print such information, it must have informed client consent, evidenced by a current standard Arizona BOSCOH HMIS Client Acknowledgement form in writing.
- C. If a client has previously given permission to multiple agencies for them to have access to her/his information, beyond basic identifying information and non-confidential service transactions, and then chooses to eliminate one or more of these agencies, the Participating Agency where the request is made will then notify the System Administrator to "lock" the record to restrict access to the other agency or agencies.
- D. In the event that a client would like to rescind consent to participate in the Arizona BOSCOH HMIS completely, the Participating Agency at which her/his desire is expressed, will work with the client to complete a brief request, which will be sent to the System Administrator to inactivate the client. Information about a client whose record has been "locked" will remain in the central database for a period of time as required by law will remain accessible by the Participating Agency which provided services to the client for reporting purposes. This record will, however, be restricted for use or viewing by other agencies.
- E. Participating Agency will not enter any fictitious or misleading client data on an individual or family in the Arizona BOSCOH HMIS.
- F. The Participating Agency will not misrepresent the number of clients served or the type of services / beds provided in the Arizona BOSCOH HMIS by entering known, inaccurate information (i.e. Participating Agency will not purposefully enter inaccurate information on a new record or to over-ride information entered by another agency).
- G. The Participating Agency will enter information into the Arizona BOSCOH HMIS according to agency and HMIS adopted standards and will strive for real-time, or close to real-time, data entry. Real-time or close to real-time is defined by either immediate data entry upon seeing a client, or data entry into the Arizona BOSCOH HMIS within one business day. This assumes that the Participating Agency has sufficient computers available for all staff performing data entry into the Arizona BOSCOH HMIS.

- H. The Participating Agency understands that with a current standard Arizona BOSCO HMIS Acknowledgement form on file, it can update, edit, and print a client's basic identifying information.
- I. The Participating Agency understands that a signed Client Acknowledgement form permits it to share confidential client information with select agencies.
- J. The Participating Agency understands that only the individual who created the assessment screens, or an authorized person⁹ by originating agency, can edit assessment screens. The Participating Agency will create a separate assessment, as needed, to indicate a change in a client's status, updates, and to edit incorrect information.
- K. Discriminatory comments by an employee, volunteer, or other person acting on behalf of the Participating Agency based on race, color, religion, national origin, ancestry, handicap, age, sex, and sexual orientation are not permitted in the Arizona BOSCO HMIS. Offensive language and profanity are not permitted in the Arizona BOSCO HMIS. This does not apply to the input of direct quotes by a client **IF** the Participating Agency believes that it is essential to enter these comments for assessment, service and treatment purposes.
- L. The Participating Agency will utilize the Arizona BOSCO HMIS for business purposes only.
- M. The Participating Agency understands the System Administrator will provide initial training and periodic updates to that training to assigned Participating Agency staff about the use of the Arizona BOSCO HMIS.
- N. The Participating Agency understands the System Administrator will provide a help desk with technical-support according to the following:

Help Desk will be provided between 9:00 a.m. to 5:00 p.m. Arizona Time. Support telephone numbers and email addresses will be provided to Participating Agencies upon signing this Agreement. Contact with the Help Desk will not incur any long distance charges.

In the event of non-response by the Help Desk the Participating Agency should notify the ADOH.

Severity Code Response Times

Severity	Description	System Administrator (SA) Response
1	Major system or	Contact Bowman Internet Systems, LLC

⁹ Individual is employed or authorized to change information by originating agency

	component is inoperative which is critical to Arizona BOS HMIS' business	within 15 minutes and notify ADOH of action plan and resolution within 1 hour
2	Arizona BOS HMIS is impacted by service delay but is still able to maintain business function	During SA normal business hours, SA will initiate problem resolution within 4 hours and notify ADOH of action plan and resolution within 6 hours
3	The problem has a reasonable circumvention and the Arizona BOS HMIS can continue with little loss of efficiency	During SA normal business hours, initiate problem resolution within 8 hours and notify ADOH of action plan within 12 hours
4	The call requires minor action or is for informational purposes only	Response time within 24 hours

- O. The Participating Agency will keep updated virus protection software on agency computers that access the Arizona BOSCOH HMIS.¹⁰
- P. Transmission of material in violation of any United States federal or state law or regulation is prohibited and includes, but is not limited to: copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
- Q. The Participating Agency will not use the Arizona BOSCOH HMIS with intent to defraud the federal, state or local government or an individual entity, or to conduct any illegal activity.
- R. The Participating Agency recognizes the Arizona BOSCOH HMIS Committee will serve as a discussion center regarding the Arizona BOSCOH HMIS, including Arizona BOSCOH HMIS process updates, policy and procedures, data analysis, and software/hardware upgrades. The Participating Agency will designate a Participating Agency staff member to attend HMIS Committee meetings regularly, and understands that the ADOH will continue to be responsible for coordinating the HMIS activities.
- S. The Participating Agency acknowledges that other agencies will periodically have access to de-identified data on the central database. To ensure the information generated by or through the Arizona BOSCOH HMIS presents an accurate picture of homelessness and

¹⁰ Participating Agency assumes financial responsibility for virus protection software.

services to people experiencing homelessness in the Arizona Balance of State region, the Participating Agency will enter data in a timely and accurate manner.

- T. Each Participating Agency assumes responsibility for (its) staff and users' compliance in regards to requirements for data entry and use of the Arizona BOSCOH HMIS. To assess the quality of data and reports generated by the system, the ADOH¹¹ will conduct periodic monitoring and reviews on data. These include, and are not limited to, the following:
 - 1. Quality of data entered by Participating Agencies
 - a. Inappropriate and/or duplicate records
 - b. Untimely and/or inaccurate information
 - c. Missing required data elements
 - 2. Report functionality
- U. Participating Agencies must notify ADOH within 24 hours of any changes to User ID including, but not limited to, new personnel, and released or terminated personnel.

IV. Reports

- A. The Participating Agency understands that it will retain access to all identifying and statistical data on the clients it serves.
- B. The Participating Agency understands that it may have access to personally identifiable client information even if the Participating Agency has not served the client or obtained a client's Client Acknowledgement form. The Participating Agency agrees to **not report or release** any identifiable client information on clients that the Participating Agency has not served or obtained a signed Client Acknowledgement form.
- C. The Participating Agency understands that before non-identifying system-wide aggregate information collected by the Arizona BOSCOH HMIS is disseminated to non-Arizona BOSCOH HMIS Member Agencies, including funders, the HMIS Committee and/or the ADOH shall endorse it¹².

V. Proprietary Rights and Database Integrity

- A. The Participating Agency will not give or share assigned user identification and passwords to access the Arizona BOSCOH HMIS with any other organization, governmental entity, business, or individual.
- B. The Participating Agency will not cause in any manner, or way, corruption of the Arizona BOSCOH HMIS. Any unauthorized access or unauthorized modification to

¹¹ The ADOH may conduct these reviews or may accept a similar review by another organization as evidence of compliance by the Participating Agency.

¹² The Arizona BOSCOH HMIS Committee will serve in part to protect the confidentiality of clients and the integrity of the data by requiring certain methods of data analysis be utilized.

computer system information or interference with normal system operations, whether on the equipment housed by the ADOH or any computer system or network related to the Arizona BOSCOH HMIS will result in immediate suspension of services and the ADOH will pursue all appropriate legal action.

VI. Hold Harmless

- A. The ADOH makes no warranties, expressed or implied. The Participating Agency, at all times, will indemnify and hold the ADOH harmless from any damages, liabilities, claims, and expenses that may be claimed against ADOH or the Participating Agency, or for injuries or damages to ADOH or the Participating Agency or another party arising from participation in the Arizona BOSCOH HMIS, or arising from any acts, omissions, neglect or fault of the Participating Agency or its agents, employees, licensees, or clients, or arising from the Participating Agency's failure to comply with laws, statutes, ordinances or regulations applicable to it or the conduct of its business. This Participating Agency will also hold the ADOH harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by the Participating Agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or acts of God. The ADOH shall not be liable to the Participating Agency for damages, losses, or injuries to the Participating Agency or another party unless such is the result of negligence or willful misconduct of the ADOH or its agents, employees, licensees or clients.
- B. The Participating Agency makes no warranties, expressed or implied. The ADOH, at all times, will indemnify and hold the Participating Agency harmless from any damages, liabilities, claims, and expenses that may be claimed against the ADOH or Participating Agency, or for injuries or damages to the ADOH, the Participating Agency, or another party arising from participation in the Arizona BOSCOH HMIS, or arising from any acts, omissions, neglect, or fault of the ADOH or its agents, employees, licensees, or clients, or arising from the ADOH's failure to comply with laws, statutes, ordinances or regulations applicable to it or the conduct of its business. Thus ADOH will also hold the Participating Agency harmless for negative repercussions resulting in the loss of data due to delays, non-deliveries, mis-deliveries, or service interruption caused by the ADOH or a Participating Agency's negligence or errors or omissions, as well as natural disasters, technological difficulties, and/or acts of God. The Participating Agency shall not be liable to the ADOH for damages, losses, or injuries to the ADOH or another party unless such is the result of negligence or willful misconduct of the Participating Agency or its agents, employees, licensees or clients.
- C. The Participating Agency agrees to keep in force a comprehensive general liability insurance policy with combined single limit coverage of not less than five hundred thousand dollars (\$500,000). Said insurance policy shall include coverage for theft or damage of the Participating Agency's Arizona BOSCOH HMIS-related hardware and software, as well as coverage of Participating Agency's indemnification obligations under this Agreement.

VII. ADOH Responsibilities

- A. ADOH agrees to enter into a contract and maintain the services of the ServicePoint software according to the terms and conditions of the contract with the Software Provider.
- B. ADOH agrees to maintain a System Administrator who will provide training, implementation, help desk and support to the Participating Agencies.

VIII. Dispute Resolution and Appeals

- A. If the Participating Agency disagrees with any element of this Agreement it shall make every effort to address and resolve those issues with ADOH.
- B. If the ADOH and the Participating Agency are unable to reach a solution, either party may raise the issue to the HMIS Committee for a solution.
- C. The HMIS Committee may recommend a solution or may request that the parties raise the issue to the HMIS Advisory Board.
- D. The HMIS Advisory Board will make every effort to resolve the issue; however, if the issue cannot be adequately resolved at this level, the HMIS Advisory Board shall recommend a process to reach resolution.

IX. Terms and Conditions

- A. The parties hereto agree that this Agreement is the complete and exclusive statement of the agreement between parties and supersedes all prior proposals and understandings, oral and written, relating to the subject matter of this Agreement.
- B. Neither party shall transfer or assign any rights or obligations without the written consent of the other party.
- C. This Agreement shall remain in-force until revoked in writing by either party with 30 days advance written notice. The exception to this term is if allegations, or actual incidences, arise regarding possible, or actual, breaches of this agreement. Should such situation arise, the ADOH may immediately suspend access to the Arizona BOSCO HMIS until the allegations are resolved in order to protect the integrity of the system.
 - 1. When the ADOH becomes aware of a possible or actual incident, it shall make a reasonable effort to address its concerns with the Executive Director of the Participating Agency prior to taking action.
 - 2. If ADOH believes that the breach by a Participating Agency is such that it may damage the integrity of the central database and the information in the central database for the Participating Agency or any other Agency, it may take immediate steps to suspend the Participating Agency's access to the Arizona

BOSCOC HMIS prior to addressing the concerns with the Executive Director of the Participating Agency. The ADOH will then address the concern with the Executive Director of the Participating Agency to resolve the issue.

3. If the concern is not resolved satisfactorily between the ADOH and the Executive Director of the Participating Agency, the ADOH shall consult with the HMIS Committee prior to taking further action.
 4. Action with a Participating Agency may include the provision of training and technical assistance, fines, suspension of access to the central database or other appropriate measures to ensure that the data integrity is maintained.
- D. If a Participating Agency believes that action taken is not appropriate, or it cannot meet the conditions of the decision, it may appeal the action to the HMIS Advisory Board. If the HMIS Advisory Board and the Participating Agency cannot reach agreement, a representative of the HMIS Advisory Board, the ADOH and Participating Agency shall address the issue before the Continuum of Care Governance Committee. Decisions by the Arizona BOSCOC HMIS Committee are final; however, every attempt will be made by all parties to reach a reasonable accommodation for the Participating Agency.
- E. This agreement may be modified or amended by written agreement executed by both parties with 30 days advance written notice.

Use of the Arizona BOSCOC HMIS constitutes acceptance of these Terms and Conditions.

Executive Director (Participating Agency) Signature

Date (d/m/y)

Printed Name of Executive Director

Participating Agency Name

Participating Agency Address

Karia Lee Basta, Special Needs Administrator
Arizona Department of Housing
1110 West Washington Street, #310
Phoenix, AZ 85007

Date (d/m/y)

ATTACHMENT B**Code of Ethics for Persons Using the****Arizona Balance of State Continuum of Care Homeless Management Information System****(Arizona BOSCO HMIS)**

As a User (agency staff or agency volunteer) of the Arizona BOSCO HMIS who enters information into the HMIS or views electronic information in the HMIS, I agree to the following:

- _____ I understand that my User ID and Password give me access to the Arizona BOSCO HMIS.
- _____ My User ID and Password are for my use only and I will not share, or allow them to be shared, with any person for any reason.
- _____ I will take all reasonable means to keep my User ID and Password physically secure to prevent its use by any other person.
- _____ I understand that the only individuals who can view information in the Arizona BOSCO HMIS are authorized users and the clients to whom the information pertains.
- _____ I understand that not all users can view all information.
- _____ I will only view, obtain, disclose, or use the database information that is necessary to perform my job.
- _____ If I am logged into the HMIS and must leave my work area for any length of time, I must log-off the HMIS and close the Internet browser before leaving the work area. Failure to log off the HMIS appropriately may result in a breach in client confidentiality and system security.
- _____ I will obtain and file a hard copy of such client consent forms as are required by my agency, state and/or federal law and the Arizona BOSCO HMIS.
- _____ I understand that I must save data at regular intervals because the system will log off at 15-minute intervals without automatically saving the information that I have entered.
- _____ I agree to enter data into the HMIS in accordance to the policies of my agency and the standards of the Arizona BOSCO HMIS.
- _____ I agree that I will not enter in the HMIS discriminatory comments made by or about an employee, volunteer, or other person based on race, color, religion, national origin, ancestry, handicap, age, sex, and sexual orientation. I understand that offensive language and profanity are not permitted in the Arizona BOSCO HMIS. This does not apply to the input of direct quotes by a client IF the Agency believes that it is essential to enter these comments for assessment, service and treatment purposes.
- _____ I agree to use the HMIS ONLY for business purposes related to serving the clients of my agency.
- _____ If I notice or suspect a security breach, I shall immediately notify the designated HMIS Contact person in my agency or the Arizona BOSCO HMIS System Administrator.
- _____ As an Arizona BOSCO HMIS user, I will treat other Member Agencies and their staff with respect, fairness and good faith.
- _____ As an HMIS user, I will treat clients and potential clients of my agency and other agencies with respect, fairness and good faith in obtaining and entering their data.
- _____ As a HMIS user, I will maintain high standards of professional conduct.
- _____ As a HMIS user, I recognize that my primary responsibility is to my client.

_____ I understand that I may be subject to personnel action, including but not limited to termination from employment or volunteer status, from my employer for failure to comply with this Code of Ethics.

I have read, understand and agree to comply with all of the statements above.

User Signature

Date

Print User Name and Job Title

User E-mail Address

Agency Name

Agency Administrator or Executive Director's Signature

Date

ATTACHMENT C

ARIZONA BALANCE OF STATE CONTINUUM OF CARE HMIS
CLIENT ACKNOWLEDGEMENT OF DATA ENTRY

The Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS) is used by provider agencies that work together to provide services for those experiencing homelessness. Client information entered into the system is a critical component of the community's ability to provide the most effective services and housing possible. It assists the agencies to plan for and provide services to you, the client. This information will be shared among agencies to provide that coordination and delivery of your services. Know that all information entered into HMIS is protected by passwords and encryption technology. Steps are taken to safeguard the information that is entered into HMIS, but no system is foolproof.

Every project that receives federal homeless project funds from the U.S. Department of Housing and Urban Development is required to enter data on persons served with those funds into the AZBOSCOC HMIS. Some projects funded through the U.S. Veterans Administration and the U.S. Department of Health and Human Services may be required to enter data into the AZBOSCOC HMIS, as well.

The AZBOSCOC HMIS shares the VI-SPDAT assessment information about all clients in order to direct clients to the most appropriate provider agency. In addition, some provider agencies work together on programs and share detailed information about their clients through HMIS. Any agency that views your information on HMIS must keep it confidential and use it only for program purposes.

By signing this document you are:

- Consenting to and authorizing the collection of information and preparation of records pertaining to the services provided to you by the Agency.
- Acknowledging that you have been informed that information about you and your family will be entered into the Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS) database.
- Acknowledging that information about you/your family may be viewed by other homeless provider agencies.

You are not required to sign this Client Acknowledgement Form. In addition, you are not required to give permission that your information be shared. If you deny permission to share your information, the record will be "locked" in HMIS and visible only to the agency creating the record. Please understand that access to shelter and housing services is available without participation in data collection.

This release can also be revoked by you at any time and that revocation must be signed and dated by you.

Please indicate by checking here if you do not wish to share your information. ☐

Client's Signature

Other Party (guardian)

Date Signed

Relationship to Client

Effective Date

End Date

Updated 10/31/2014

AZ BOS COC HMIS Partner Agencies

ACHIEVE
American Red Cross
Bisbee Coalition for the Homeless
Bread of Life
CAHRA
Catholic Charities Community Services
Cornerstone
CPSA
Crossroads
Good Neighbor Alliance
Good Shepherd
Horizon Human Services
Housing Solutions of Northern Arizona
Mohave County Community Services
NARBHA
National Community Health Partners
NAZCARE
Northern Arizona Veterans' Resource Center
Northland Cares
OCCAC
SEACAP
Sunshine Rescue Mission
The Guidance Center
U.S. Vets
WACOG
West Yavapai Guidance Clinic
White Mountain Catholic Charities
Women's Transition Project

ATTACHMENT D



BOWMAN SYSTEMS SECURING CLIENT DATA

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intended or should be inferred.

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SECURING CLIENT DATA

Bowman Systems is committed to maintaining optimum client data security by meeting and exceeding industry standard practices. As a leader in software and Information Technology (IT) services for the health and human services industry, Bowman Systems considers data security as the cornerstone of all of its development efforts. In 1999, Bowman Systems pioneered its secured data-sharing model, enabling multi-agency collaboratives to collaborate while safeguarding client data (*ServicePoint* 1.0). In 2000, Bowman Systems was the first web-based client data system to offer integrated database-level encryption. Again, in 2001, Bowman Systems pioneered its integrated Audit Trail system before the HIPAA requirement.

Bowman Systems has always held conviction that our products be fully web based and that we own and operate our own data center. We seek to provide best of class data center services to ensure data security and regulatory compliance, and continuously expand and invest in our data center to include physical security, network security, redundant power, redundant HVAC, fire suppression systems and full time staff to manage all of the afore mentioned.

This document outlines the measures taken by Bowman Systems to secure all client data on each of our customer's *ServicePoint* sites. The steps and precautions taken to ensure that data is stored and transmitted securely are divided into six main sections – Access Security, Site Security, Network Security, Disaster Recovery, HIPAA Compliance, and Unauthorized Access.

ACCESS SECURITY

Access Security begins at Bowman Systems with a focus on the following areas:

- Bowman Systems Employees
- Bowman Systems Access to *ServicePoint*
- Audit Trails
- Customer Access to *ServicePoint*.

Bowman Systems Employees

Bowman Systems' designated Security Officer assures employees are held to the highest standards when it comes to both company and customer data security. Employees who have access to client data are subject to a national background check, training on confidentiality requirements (company, HIPAA, HUD), and must sign a confidentiality statement as part of their employee agreement.

Bowman Systems Access to *ServicePoint*

- Only a limited number of Bowman Systems' staff has access to a customer's *ServicePoint* site and client data. Access occurs only when you request an installation, import of data, implementation upgrade, or require assistance by support staff to troubleshoot a problem.



- ◆ The contract between the customer and Bowman Systems legally compels Bowman Systems to hold all client data stored in the customer's database in strict confidence. Bowman Systems will take all reasonable precautions to prevent the disclosure to outside parties of such information, except as may be necessary by reason of legal, accounting or regulatory requirements.
- ◆ Access to the customer's system data by Bowman Systems support staff can be monitored by running an *Audit Report* (see Automated Audit Trail below).

Audit Trail

- ◆ *ServicePoint* automatically tracks caller, client, and resource related activity by the use of an audit trail. This system function logs the time and type of activity, as well as the name of the user who viewed, added, edited, or deleted the information.
- ◆ All changes to Resource records are automatically tracked by the User (updates, as well as, date and time the updates were made). In addition, there is a Date of Official Update that is set when the Resource record has been formally reviewed. This section includes not only date and time of the Official update but also which User performed the action, which organization requested the Official Update, and a notes field for describing the reason for the update (such as Annual Review, Agency Request, etc).
- ◆ • To retrieve information created by the audit trail, an *Audit* report can be generated in the Reporting section of *ServicePoint*. Access to client audit information is limited to System Administrator and Agency Administrator access levels.

Customer Access to ServicePoint

- ◆ To ensure authorized access, each user is issued a user name and password for entrance into the *ServicePoint* application.
 - ◆ Each *ServicePoint* user is required to have a unique User ID to log into the application.
 - ◆ Passwords must be 8 to 16 characters in length and must contain at least two numbers.
 - ◆ The system allows only one login per password at a time. A user cannot log into the system on two terminals at the same time using a single password.
 - ◆ Passwords automatically expire every 45 days requiring the user to create a new password.
 - ◆ A prompt appears when you need to choose a new password.
 - ◆ The same password cannot be used consecutively.
 - ◆ To enforce password security, *ServicePoint* will not allow a browser to save a password. In addition, if FOUR consecutive logon attempts with the incorrect password are made the user account will need to be reset by your System Administrator. This security feature prevents access to the site by a password generator.
 - ◆ Passwords are stored as hashed values in the *ServicePoint* database
- ◆ *ServicePoint* has an automatic logout function for users who have been idle for a pre-determined period. (The default setting is 30 minutes.) This function decreases potential viewing and/or manipulation of client data by unauthorized individuals. Although the default setting is 30



minutes, each installation can request Bowman Systems to set the system timeout for a length that meets their particular policies and procedures.

- ◆ To limit who can view and/or modify the customer's client data, individuals are assigned one of sixteen (16) User Access Levels. Each user level has certain security restrictions applied to it. Each user level has access to certain *ServicePoint* features and the ability to view certain pieces of client information. The System Administrators II can see all data, even when it is closed.
- ◆ Each level grants different access rights to the various sections (ClientPoint, ResourcePoint, SkanPoint, ShelterPoint, Admin etc.) of the application.

SITE SECURITY

Site security is a high priority since it not only helps protect the customer's stored client data, but also protects the equipment used to host the customer's data. To ensure the protection and service reliability for the customer's system, Bowman Systems has instituted the following security levels:

Building Security

Bowman Systems' offices are located in a large commercial complex with the following perimeter security systems:

- ◆ 24-hour security personnel
- ◆ 24-hour video surveillance
- ◆ Building fire suppression system
- ◆ After-hours Key Card entry to building
- ◆ After-hours Key Card elevator access
- ◆ Locked stairwells during non-business hours.

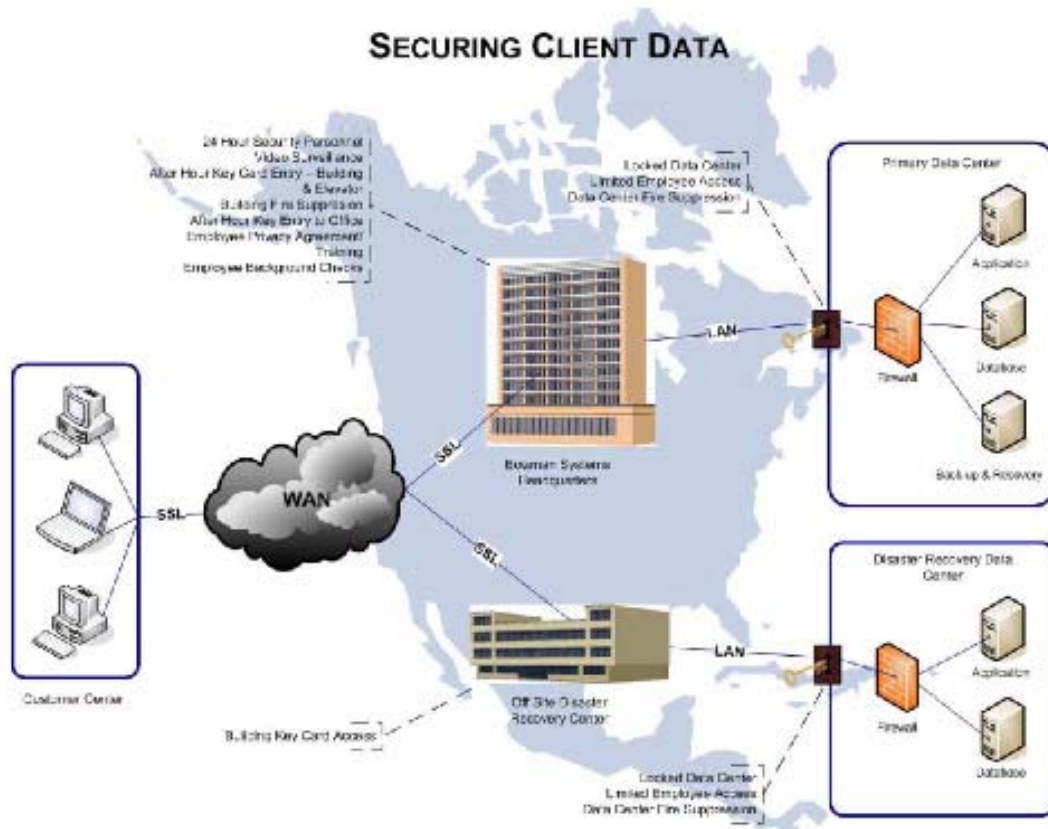
Bowman Systems Headquarters Security

The Bowman Systems offices and data centers include the following additional levels of security.

- ◆ After-hours key entry to offices
- ◆ Dedicated and secured Data Center
 - ◆ Locked down 24-hours per day
 - ◆ Two separate, fully redundant HVAC systems for server areas
 - ◆ Only accessible by management controlled key
 - ◆ Protected by a state of the art, non-liquid automatic fire suppression system
 - ◆ No access is permitted to the office cleaning staff



- ♦ Accessed by key personnel only (e.g. Information Technology and Management staff). Access is required for nightly data backups, new installations, upgrades and maintenance.



NETWORK SECURITY

Database security includes protection of client data residing on the database server and as it is transmitted over the internet through the application server. The security measures in place ensure that client data is only available and accessed by authorized users.

There is a nightly backup of the *ServicePoint* system that is comprised of a backup of the database and a backup of the application code. Our standard protocol includes nightly tape backup of the client's database that is carried three miles off-site and stored in a fireproof facility. Bowman Systems maintains redundant power for all on-site servers via building power and building generator and redundant bandwidth provided via two separate upstream providers. Our data center contains a state-of-the-art, non-destructive fire-suppression system. Bowman Systems also utilizes RAID 5 (Redundant Array of Independent Disks) to mirror the hard drives, provide faster data throughput and ensure reliable data.



- ♦ Multiple broadband connections, fully load balanced for reliability and speed.
- ♦ Reliable Enterprise class Cisco switches and routing equipment.
- ♦ A natural gas powered generator capable of powering the facility indefinitely and UPS backups to supply uninterrupted power. This system is tested monthly (in such a way that power is not interrupted) to ensure reliability.
- ♦ Two separate, fully redundant HVAC systems for server areas.
- ♦ A non-liquid automatic fire control system.
- ♦ A physically secure building with keycard access, video surveillance and 24 x 7 security guard controlled access.

Data Security

To ensure availability of customer data in the event of system failure or malicious access, redundant records are created and stored in the following manner:

- ♦ Nightly database backups.
- ♦ Offsite storage of backups
- ♦ 7 day backup history stored locally on instantly accessible RAID storage
- ♦ 24 hours backed up locally on instantly-accessible disk storage
- ♦ 1 month backup history stored off site
- ♦ 24 x 7 access to Bowman Systems emergency line to provide assistance related to “outages” or “downtime”.

Firewalls

To enhance security further, firewalls are in place on all servers hosted by Bowman Systems. As detailed below, there are multiple levels of firewall security:

- ♦ The *ServicePoint* application and database servers are separate from the Bowman Systems internal network.
- ♦ Bowman Systems utilizes an industry standard Intrusion Detection System to pinpoint unauthorized attempts at accessing its network and to shield the customer’s data in the event of such an attempt.
- ♦ Only regular and secured HTTP traffic are permitted through to the Bowman Systems application servers.
- ♦ As a security policy, specifics on the type of equipment, protocols, and procedures in use are never revealed.
- ♦ Database servers are only accessible via an internal network connection from our application servers.



Encryption

SSL Encryption

SSL encryption ONLY encrypts the data going across the internet to the end-user's web browser. Bowman Systems uses AES-256 encryption (Advanced Encryption Standard, 256-bit) in conjunction with RSA 2048-bit key lengths. A description can be found at http://en.wikipedia.org/wiki/Key_size.

When an end-user accesses their site, an SSL (encrypted) negotiation is performed between the server at Bowman Systems datacenter and the end user's web browser. The traffic that then flows between the server and the end user's workstation is encrypted using the SSL certificate installed on that server. This prevents anyone that is sitting in between our server here and the end user's workstation from being able to intercept potentially sensitive data. The AES-256 is the method in which the data is encrypted. There are various forms of SSL encryption. The key length make it more difficult to decrypt the encrypted data.

PUBLIC KEY INFRASTRUCTURE (PKI) (OPTIONAL)

As an option, Private Key Infrastructure (PKI) is available for those needing additional security frameworks. PKI is an additional layer of security on TOP of our standard SSL certificates. It is still SSL encrypted, however, this method of encryption requires a matching server certificate / client certificate pair in order to unencrypt the data that is sent from the end user's *Servicepoint* site to their Web Browser. Without the appropriate PKI client certificate installed on the end-user's workstation, their web browser will not be able to unencrypt the data and therefore will not be able to access the site. The PKI Client Certificate cannot be installed on a workstation without the appropriate password that accompanies the certificate. This allows the customer to regulate exactly who can and who cannot access their *Servicepoint* site.

Database Encryption (Optional)

The data in *ServicePoint* encrypted databases are encrypted with AES-128.

DISASTER RECOVERY

Due to the nature of technology, unforeseen service outages may occur. In order to assure service reliability for hosted *ServicePoint* applications, Bowman Systems offers the following disaster recovery options.

Basic Disaster Recovery Plan

The basic Disaster Recovery Plan is included in the standard *ServicePoint* contract and includes the following:

- Nightly database backups.
- Offsite storage of backups
- 7 day backup history stored locally on instantly accessible RAID storage



- 1 month backup history stored off site
- 24 x 7 access to Bowman Systems emergency line to provide assistance related to “outages” or “downtime”.
- 24 hours backed up locally on instantly-accessible disk storage

Standard Recovery: All customer site databases are stored online, and are readily accessible for approximately 24 hours; backups are kept for approximately one (1) month. Upon recognition of a system failure, a site can be copied to a standby server, and a database can be restored, and site recreated within three (3) to four (4) hours if online backups are accessible. As a rule, a site restoration can be made within six (6) to eight (8) hours. On-site backups are made once daily and a restore of this backup may incur some data loss between when the backup was made and when the system failure occurred.

All internal servers are configured in hot-swappable hard drive RAID configurations. All systems are configured with hot-swappable redundant power supply units. Our Internet connectivity is comprised of a primary and secondary connection with separate internet service providers to ensure redundancy in the event of an ISP connectivity outage. The primary Core routers are configured with redundant power supplies, and are configured in tandem so that if one core router fails the secondary router will continue operation with little to no interruption in service. All servers, network devices, and related hardware are powered via APC Battery Backup units that in turn are all connected to electrical circuits that are connected to a building generator.

All client data is backed-up online and stored on a central file server repository for 24 hours. Each night a encrypted backup is made of these client databases and secured in an offsite datacenter.

Historical data can be restored from backups as long as the data requested is 30 days or newer. As a rule, the data can be restored to a standby server within 6-8 hours without affecting the current live site. Data can then be selectively queried and/or restored to the live site.

For power outage, our systems are backed up via APC battery back-up units, which are also in turn connected via generator-backed up electrical circuits. For a system crash, Non-Premium Disaster Recovery Customers can expect six (6) to eight (8) hours before a system restore with potential for some small data loss (data that was entered between the last backup and when the failure occurred) if a restore is necessary. If the failure is not hard drive related these times will possibly be much less since the drives themselves can be repopulated into a standby server.

All major outages are immediately brought to the attention of executive management. Bowman Systems support staff helps manage communication or messaging to customers as progress is made to address the service outage. Bowman Systems takes major outages seriously, understands, and appreciates that the customer becomes a tool and utility for daily activity and client service workflow.

Premium Disaster Recovery Plan (Optional)

The *optional* Premium Disaster Recovery plan includes all of the Basic Plan features plus several additional levels of support to enhance disaster recovery capability. Additional features included are as follows:

- Off site on a different Internet provider and on a separate electrical grid backups of the application server via a secured Virtual Private Network (VPN) connection



- Near-Instantaneous backups of application site (no files older than 15 minutes)
- Minute-level off site replication of database in case of a primary data center failure
- Priority level response (ensures downtime will not exceed 4 hours)

HIPAA COMPLIANCE

HIPAA compliance is a requirement for many agencies that use *ServicePoint*, particularly as the compliance relates to the HIPAA standards for security. The following five (5) methods ensure that *ServicePoint* is fully compliant with HIPAA data center standards:

- Network Security includes firewalls, certification servers, VPN access, and Operating System authentication.
- Encryption (optional – pricing is available upon request) is a database level security which encrypts confidential information located in the database tables.
- Audit Trails log and report on users who have viewed, updated, or deleted client records.
- Client Record Privacy Options allow or restrict access to all or part of a client file, including individual fields (data level).
- Automatic timeout logs a user out of the system after a specified period, thereby decreasing the potential viewing or manipulation of client data by unauthorized individuals.

UNAUTHORIZED ACCESS

If an unauthorized entity were to gain access to a customer's system and client data or if there were suspicion of probable access, Bowman Systems would take the following steps:

- The system would be examined to determine the presence of system or data corruption.
- If the system has been compromised, the system would be taken offline.
- Using the previous night's backup, a restored copy of the system data would be loaded onto another server, and the system brought back on line with the back-up data.
- Comparing the back-up database to the database taken offline, an investigation would be launched to determine the extent of the unauthorized activity/corruption, and the corrective action needed.
- Upon completion of the investigation, findings would be reported to the customer and options would be discussed.
- Upon customer approval, corrective action would be initiated. Corrective action could include all or part of the following:
 - ◆ The original hard drive would be completely erased and rebuilt, including a new operating system, SSL Certificate, application(s), and the back-up database.
 - ◆ If applicable and feasible, lost data from the original database would be restored.

ATTACHMENT E

AZBOSCOC HMIS

Data Sharing Agreement

The following agencies hereby enter into a Data Sharing Agreement:

1. _____
(Name of program / agency)
2. _____
(Name of program / agency)
3. _____
(Name of program / agency)
4. _____
(Name of program / agency)

The purpose of this agreement is to coordinate housing, supportive and other needed services for clients entered into the Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS). Furthermore, the participating agencies:

- Acknowledge that in transmitting, receiving, storing, processing or otherwise dealing with any consumer protected information, they are fully bound by state and federal statute or regulations governing confidentiality of patient records, including the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164) and cannot use or disclose the information except as permitted or required by this agreement or by law.
- Acknowledge that they are prohibited from making any further disclosure of this information unless further disclosure is expressly permitted by the written consent of the person to whom it pertains or as otherwise permitted by state and federal regulations governing confidentiality of patient records, including the Federal Law of Confidentiality for Alcohol and Drug Abuse Patients (42 CFR, Part 2) and the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164). A general authorization for the release of information is NOT sufficient for this purpose.
- Agree to use appropriate safeguards to prevent the unauthorized use or disclosure of the protected information.

- Agree to endeavor to notify each of the other participating agencies and the Arizona Department of Housing, within one (1) business day, of any breach, use or disclosure of the protected information not provided for by this agreement.
- Agree to adhere to the standards outlined within the Health Insurance Portability and Accountability Act of 1996 ('HIPAA', 45 CFR, Parts 160 & 164) and pertinent federal regulations which provide consumers access to their protected information, (164.524), the right to amend protected information (164.526) and receive an accounting of disclosures of protected information (164.528).
- Agree to notify each of the other participating agencies of their intent to terminate their participation in this agreement.
- Agree to resist, through judicial proceedings, any judicial or quasi-judicial effort to obtain access to protected information pertaining to consumers, unless expressly provided for in state and/or federal regulations. The Parties agree to give notice of such action as with any other security breach or unplanned disclosure.

The Signatures below Constitute Acceptance of the Data Sharing Agreement and the signatories confirm that they are duly authorized to enter into the agreement on behalf of their respective entities.

1. Program Name: _____
 Address: _____
 Name & Title of Authorized Signature: _____

 Signature Date

2. Program Name: _____
 Address: _____
 Name & Title of Authorized Signature: _____

 Signature Date

3. Program Name: _____
Address: _____
Name & Title of Authorized Signature: _____

Signature

Date

4. Program Name: _____
Address: _____
Name & Title of Authorized Signature: _____

Signature

Date

#

#

#

ATTACHMENT F

AZBOSCOC HMIS Data Sharing Exit Agreement

_____ (agency/project) hereby requests removal from the Arizona Balance of State Continuum of Care Homeless Management Information System (AZBOSCOC HMIS) data sharing network.

By signing this form, the above-named agency/project understands that client-level data will not be available for other AZBOSCOC HMIS-participating agencies. This may limit the coordination, referrals, and planning efforts on behalf of AZBOSCOC HMIS clients. However, the above-named agency/project qualifies to exit because it:

- Receives federal funding for alcohol and/or drug treatment under CFR Title 42, Part 2.
- Receives federal funding under Housing Opportunities for Persons with AIDS (HOPWA) both complete and/or formula.

Other reason, please list:

The above-named agency/project understands that ADOH reserves the right to deny a request for exit and will respond in writing if a denial is issued.

Signature

Print Name of Executive Director

#

Date

For Pinal County Housing Department:

1C-4. List each of the Public Housing Agencies (PHAs) within the CoC's geographic area. For each PHA, provide the percentage of new admissions that were homeless at the time of admission between October 1, 2014 and March 31, 2015, and indicate whether the PHA has a homeless admissions preference in its Public Housing and/or Housing Choice Voucher (HCV) program. (Full credit consideration may be given for the relevant excerpt from the PHA's administrative planning document(s) clearly showing the PHA's homeless preference, e.g. Administration Plan, Admissions and Continued Occupancy Policy (ACOP), Annual Plan, or 5-Year Plan, as appropriate).

For Pinal County Housing Department (PCHD) we only entered 2 families for the timeframe mentioned above. 0 families were homeless. We do not have a Our Waiting List ranking order is:

H. RANKING LOCAL PREFERENCES

Within each of the following numbered categories, applicants will be served by date and time of application.

- 1.Applicants who live and/or work in the jurisdiction of PINAL COUNTY HOUSING Department and who are families of two or more people that include a dependent or individuals who are disabled or age 62 or older, or veterans, or active U.S. Service Person or a homeless person with a disability
- 2.Applicants who live and/or work in the jurisdiction of PINAL COUNTY HOUSING Department and who are families of two or more people that include a dependent or individuals who are disabled or age 62 or older, or veterans, or active U.S. Service Person or a homeless person with a disability
- 3.Other applicants who live and/or work in the jurisdiction of PINAL COUNTY HOUSING Department
- 4.Applicants who do not live and/or work in Pinal County and who are families of two or more people that include a dependent or individuals who are disabled or age 62 or older, or veterans, or active U.S. Service Person or a homeless person with a disability
- 5.Other applicants who do not live and/or work in Pinal County.

If you need any other info please let me know. Lynda

Lynda Brophy

Section 8 Supervisor

PINAL COUNTY HOUSING DEPT.

lynda.brophy@pinalcountytaz.gov

Phone: 520-866-7207

Fax: 520-866-7222

Cochise County Arizona

From: "Baca, Anita M" <ABaca@cochise.az.gov>

Date: November 2, 2015 at 9:43:59 AM MST

To: 'Karia Basta' <karia.basta@azhousing.gov>

Subject: RE: Balance of State Continuum of Care HUD NOFA Question

We have a chronically homeless preference, but only provided that preference to once person I am aware of for Section 8. She was staying at WTP. The need for HUD-VASH in our area has increased from 25 to 75 in the last year and we have 10 port-ins from Tucson we are administering as well.

Our board has begun the discussion of changing our preference from chronically homeless to homeless as well as possibly setting aside vouchers from Section 8 for homeless. We hope to have the changes decide on when we submit our Annual Plan in April 2016.

Anita Baca, Housing Director
(520) 432-8883



Arizona
Department
of Housing

Special Needs Housing Manual

Date Issued: July 1, 2015

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Disclaimer:

The Special Needs Housing Manual is not intended to cover all of the intricacies of administering a Continuum of Care project. Sub-recipients are expected to avail themselves of resources offered on the U.S. Department of Housing and Urban Development HUD Exchange website, <https://www.hudexchange.info/>, including webinars, trainings, brochures and manuals. In addition, the Continuum of Care program is operating under a proposed rule (24 CFR part 578). As such, clarifications and programmatic changes are ongoing as HUD refines the program in anticipation of the release of the final rule. It is the responsibility of the sub-recipient to monitor the HUD Exchange website for modifications of the guidelines contained in this manual.

CHAPTER 1: ADOH Special Needs Housing Assistance Programs

A. Mission Statement

The Arizona Department of Housing provides housing and community revitalization to benefit the people of Arizona.

B. Best Practices

In accomplishing the Mission Statement above the Special Needs Division will work towards universal implementation of Housing First principles utilizing the Housing-Based Case Management model.

C. About the Arizona Department of Housing

The Arizona Department of Housing (ADOH) serves Arizonans through programs that recognize the dignity of the individual, their families and their communities.

The Special Needs Division enables the agency to address the housing needs of populations that require a more comprehensive approach to housing stability beyond basic affordable housing opportunities. These populations have been identified as those living with HIV/AIDS, serious mental illness, chronic substance abuse, persons and families who are homeless and victims of domestic violence.

Housing is an integral part of health care. When those we work for go without decent and affordable homes, services are more difficult to deliver, illnesses are exacerbated and homeless populations increase.

In 1995, the first Continuum of Care contracts were received through the U.S. Department of Housing and Urban Development (HUD) to administer Shelter Plus Care (SPC) programs, to provide rental assistance for individuals and families that were experiencing homelessness. These grants, all in Maricopa County, were Tenant-Based Rental Assistance (TBRA) grants. Since that time we have applied for and been awarded additional Housing Program grants funded through McKinney-Vento administered through approximately thirty-five (35) different contracts covering fourteen (14) counties.

In addition to Continuum of Care, ADOH Special Needs Division currently oversees HOPWA contracts, as well as various Housing Trust Fund contracts for a wide variety of special needs from fair housing to shelter operations.

This Housing Manual shall be used by agencies who subcontract with ADOH to administer any Special Needs programs.

D. Statement of Policies and Objectives

The functions and responsibilities of the Special Needs Division staff, hereinafter referred to as SND, shall be in compliance with the personnel policies of ADOH and of the State of Arizona. All housing assistance programs administered by ADOH SND shall be in compliance with all federal, state and local housing laws, rules and regulations.

E. Purpose of this Manual

The purpose of the Housing Manual is to establish policies for items not covered under federal or state regulations. The aim is also to provide standard concepts, definitions and procedures to enable efficient administration and the collection and reporting of performance data that is comparable across the state. The Housing Manual covers both admission to and continued participation in these projects and how that will be accomplished. The policies are the same for all housing assistance programs unless otherwise noted. The Housing Manual is written primarily with sub-recipient and service provider staff in mind. It is the responsibility of the sub-recipient to know which specific program they are contracted to administer.

Each of the ADOH SND housing assistance projects is subject to the terms and conditions of this Housing Manual. To the extent an issue is not otherwise explained in the Housing Manual, the appropriate provisions of the McKinney-Vento Act as amended by HEARTH (The McKinney-Vento Homeless Assistance Act as amended by The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009), COC Program Interim Rule (24 CFR part 578), HOPWA (24 CFR part 574) or the Fair Housing Acts (42 USC 3601-19) will be followed. This Housing Manual is subject to change depending on changes in funding contracts as well as changes in federal regulations.

F. Fair Housing Policy

It is the policy of ADOH to fully comply with all federal, state and local nondiscrimination laws and to be in accordance with the rules and regulations governing fair housing and equal opportunity in housing and employment.

Projects shall not deny any family or individual on account of race, color, gender, religion, national or ethnic origin, family or marital status, handicap or disability, the opportunity to apply for or receive assistance under ADOH's and HUD's rental assistance programs, within the requirements and regulations of the federal rules and regulations.

To further ADOH's commitment to full compliance with applicable civil right laws, ADOH will provide federal, state and where practical, local information to all participants regarding housing discrimination and any recourse available to them should they feel they have been the victim of discrimination in housing. Such information will be made available during the briefing session and all applicable Fair Housing Information and Discrimination Complaint Forms will be made a part of the Tenant's Packet. To file a complaint, contact HUD at (800) 669-9777 or file on line at http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination. You may also contact the Arizona Attorney General's Office hotline at (602) 542-5263 in Phoenix or (520) 628-6504 in Tucson.

Project participants and sub-recipients can access information about the Arizona Residential Landlord and Tenant Act on the ADOH website at <https://housing.az.gov/sites/default/files/documents/files/Landlord%2520Tenant%2520Act.pdf> ADOH SND subscribes to HUD's "open-housing" policy. Sub-recipients and participants will know of available housing that ensures greater mobility and housing choice to low-income households served by ADOH.

G. Access to Information

ADOH strives to maintain public information about its programs as well as useful information about affordable housing resources in Arizona, generally, on its website: <https://housing.az.gov/>. Users of this Housing Manual are encouraged to use the information presented at the website and to suggest changes and additional content whenever appropriate.

H. Terminology

Terminology used in this Housing Manual includes the following:

"ADOH SND" refers to the Arizona Department of Housing Special Needs Division.

"Applicant" refers to a person in the process of applying for rental assistance. A person is considered an applicant until their income eligibility for a housing assistance project is verified.

"AMI" refers to Area Median Household Income.

"Briefing" refers to an instance of giving precise instructions or essential information with regarding to the specific housing project.

"Case Management" refers to the Housing-Based Case Management model whereby case managers are organized and trained professionals that act as positive change agents in holistically assisting individuals/families in achieving and maintaining housing while concurrently promoting awareness and teaching strategies that reduce the likelihood of a return to homelessness in the future.

"Chronic Homelessness" refers to an individual who:

- (i) is homeless and lives in a place not meant for human habitation, a safe haven or in an emergency shelter; and
 - (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven or in an emergency shelter continuously for at least one (1) year or on at least four (4) separate occasions in the last three (3) years; and
 - (iii) can be diagnosed with one (1) or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), post-traumatic stress disorder, cognitive impairments resulting from brain injury or chronic physical illness or disability;
- (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than ninety (90) days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
 - (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
 - (4) A person in transitional housing—even if they met the chronic homelessness criteria prior to entering transitional housing—may NOT be considered chronically homeless.

"Contract Rent" refers to the full monthly cost of renting a unit as set by the owner or landlord.

"Disability" refers to a diagnosable substance abuse disorder, serious mental illness, developmental disability or chronic physical illness or disability, including the co-occurrence of two (2) or more of these conditions. A disabling condition results in substantial functional limitations in one (1) or more of the following areas of major life activity:

- walking;
- talking;
- hearing;
- seeing;
- breathing;
- learning;
- performing manual tasks; and

- caring for one's self.

"FMR (Fair Market Rent)" refers to rent schedules published in the Federal Register, which establish eligible rent levels allowed under the Housing Choice Voucher Program/Section 8 by geographic area. Also used by other rent subsidy programs including Continuum of Care.

"Habitability Standards" refers to meeting local government safety and sanitation standards. In addition, there are a number of basic standards to ensure that housing units are safe, sanitary and adequately maintained.

"HAP" refers to Housing Assistance Payments contract, which is the amount of money sub-recipients pays in rent on behalf of a project participant to an owner or landlord.

"Homeless" refers to an individual or family who qualifies for a program based on one (1) of the four (4) categories of homelessness as defined by HUD. (See Attachment 2: "HUD Definition of Homeless".)

"HOPWA" refers to Housing Opportunities for People with AIDS.

"Housing First" refers to a project following a "Housing First" model. The project cannot place preconditions or eligibility requirements—beyond HUD's eligibility requirements—on persons entering housing, nor can it require program participants to participate in supportive services activities or make other rules, such as sobriety, a condition of housing. Sub-recipients may offer and encourage program participants to participate in services, but there may be no time limit as to when he/she must do so.

"HQS" refers to Housing Quality Standards, which are rules set by HUD defining minimum standards of habitability and applied to all programs. It is a pass/fail system. In the AZ BOSCO, it is expected that inspectors attend training, such as HQS or UPCS (Uniform Physical Condition Standards).

"HTF" refers to State Housing Trust Fund, a funding source provided to ADOH through state legislation.

"In-kind" is a donation or gift of time, fiscal resources, professional expertise, use of facilities, project sponsorship, equipment or other comparable donations without charge.

"Landlord" refers to a person or entity that manages one (1) or more rental units on behalf of the owner (the landlord and owner may be the same person or entity).

"Leasing" means that the lease is between the recipient of funds and the landlord/owner. Leasing funds may not be used to lease units or structures owned by the recipient, sub-recipient, their parent organization(s), any other related organization or organizations that are members of a partnership where the partnership owns the structure.

"Leverage" is cash or in-kind contributions in excess of the minimum required match contributions for a project. Leveraged funds may be used for other aspects of a project even if the costs are not allowable in the COC program.

"Match" is defined as the sub-recipient's minimum required cash or in-kind contribution to the project.

"Memorandum of Understanding (MOU)" as applies to match and leverage is a written agreement between the sub-recipient and the third party outlining provision of services.

"Owner" refers to a person or entity that owns one (1) or more rental units (the owner and landlord may be the same person or entity).

"Participant" refers to a person who has been approved for enrollment in an ADOH SND housing assistance project and is either currently receiving rental assistance or is seeking an assisted housing unit.

"Program" refers to any of the assistance programs operated under the jurisdiction of ADOH SND (i.e. Continuum of Care, Legacy SPC, TBRA, STRMU).

"Project" refers to a specific project supported by a particular funding source (i.e. Inverrary House, Forward Step, etc.).

"Rental Assistance" refers to an eligible cost for permanent and transitional housing. Rental assistance may include tenant-based, project based or sponsor-based rental assistance. The lease is between the participant and the landlord/owner; the sub-recipient has a "Housing Assistance Payments contract" with the landlord/owner to pay the difference between what the participant pays and the contract rent.

"ROI" refers to release of information.

"RRH (Rapid Re-housing Assistance)" refers to Continuum of Care funds that may provide supportive services and/or short-term (up to three (3) months) and/or medium-term (for three (3) to twenty-four (24) months) tenant-based rental assistance, as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible into permanent housing and achieve stability in that housing.

"SHP" refers to the former HUD program "Supportive Housing Program"; now referred to as Continuum of Care.

"SPDAT – Service Prioritization Decision Assistance Tool" refers to a survey tool created by OrgCode Consulting, Inc. and is an evidence-informed approach to assessing an individual's or family's acuity. The tool, across multiple components, prioritizes who to serve next and why, while concurrently identifying the areas in the person/family's life where support is most likely necessary in order to avoid housing instability.

"SPC" or "S+C" refers to the former HUD rental assistance program "Shelter Plus Care"; now referred to as Continuum of Care.

"**Sub-recipient**" refers to entities sub-contracted with ADOH SND to provide housing services connected with the programs.

"**TBRA (Tenant Based Rental Assistance)**" See Rental Assistance.

"**TTP**" or "**Tenant Rent**" refers to the total tenant payment (i.e. the share of rent for which a project participant is responsible and which is not paid by the grant).

"**UPCS**" refers to Uniform Physical Condition Standards, which is an inspection protocol resulting in a graded system. In the AZ BOSCO, it is expected that inspectors attend training, such as HQS or UPCS.

"**VI-F-SPDAT – Family Vulnerability Index-Service Prioritization Decision Assistance Tool**" refers to a version of the VI-SPDAT designed to assess the needs of families experiencing homelessness.

"**VI-SPDAT – Vulnerability Index-Service Prioritization Decision Assistance Tool**" refers to a survey created by Community Solutions and OrgCode Consulting, Inc. as a pre-screening, or triage, tool that is used by service providers within a community to assess the health and social needs of homeless persons and match them with the most appropriate support and housing interventions that are available.

See also "Glossary of Housing Terms" at

<https://housing.az.gov/sites/default/files/documents/files/Glossary%20of%20Affordable%20Housing%20Terms.pdf>

I. Forms

Forms to be used by ADOH SND and sub-recipients are located at the end of the Housing Manual in the Attachments section. Where appropriate, some of these forms are presented in a generic format that can be adapted by sub-recipients for their use in operating ADOH SND assistance programs. Sub-recipients have the authority to use these forms, but they must be put on the sub-recipient's letterhead. There are a few places, generally in the first and last paragraphs of a document, where sub-recipients must insert their own agency names and addresses. These documents were designed so that minimal insertions need to be made.

Other forms, such as the Homelessness Certification Form (See Attachment 0A: "Transitional Homeless Certification Form" and Attachment 0B: "Permanent Housing Homeless Certification Form"), are specifically designed to serve the needs of ADOH SND and sub-recipients and may

not be altered except by ADOH SND. The status of each form as required or generic is noted in the Attachments section.

***NOTE:** The Housing Manual does not have a document for every need or every model. Sub-recipients may have to create their own documents as needed. If this is done, the ADOH SND staff must approve prior to use.*

J. General Obligations of the Key Parties

Sometimes an agency may be both a sub-recipient and a service provider. Even if a sub-recipient receives service funding in a continuum contract, it is not expected to be enough to cover all services needed by a project participant. In the following obligations of each party, keep in mind that sub-recipient is referring to housing activities and provider is referring to services.

Obligations of ADOH SND

- **Monitor Project Performance:** Monitor each sub-recipient's performance and conformance to funding source directives. ADOH SND shall make a site visit to a sub-recipient to review all projects under contract. ADOH SND provides ongoing, up-to-date technical assistance.
- **Ensure Uniformity:** Ensure uniformity among the sub-recipients and conformance with funding contracts and applicable laws. ADOH SND must give its approval to any changes or additions to the materials and procedures used for any ADOH SND housing assistance project.
- **Monitor Zero Income:** Monitor participants who report \$0 income. Such participants shall be tracked by ADOH SND to assure that they apply for benefits, and/or employment in a timely manner. Case managers may be asked to verify that the project participant is actively engaged in activities that will enhance their ability to gain employment, is seeking employment or that benefits were denied and an appeal has been filed.

Obligations of the Service Provider Case Manager

- **Make Assessments and Referrals:** Make an assessment and referral for an applicant when independent living is a goal of the applicant's individual treatment plan.
- **Submit Applications:** Help an applicant through the application, briefing, verification and other paperwork that will initiate participation in a project.

- Assist with Housing Search: Assist the participant in the process of locating a unit within thirty (30) days and notifying the sub-recipient if more time is needed and show why it is needed. The maximum time allowed is ninety (90) days.
- Deliver Needed Support Services: Assist the participant in the services the participant is currently receiving and arrange for additional support services as necessary to support the client in an independent living situation.
- Transfer Support Services to New Unit: Ensure the participant gets moved into the new unit and that all benefits and appropriate services are transferred, if necessary.
- Provide Initial Housing Case Management: Maintain an intense level of in-person contact with the participant for the first two (2) to three (3) weeks after move-in and taper that contact, as appropriate. For participants who only need minimal contact, at least one (1) contact per month shall be made.
- Manage Clinical Issues: Manage any clinical issues that arise and work with the sub-recipient when a clinical issue affects the housing situation.
- Document Support Services: Be responsible for documenting support services.
- Increase Participant Income: Ensure that participants who report \$0 income apply for benefits and/or employment in a timely manner. Case managers may be asked to verify the participant is actively engaged in activities that will enhance their ability to gain employment, is seeking employment or that benefits were denied and an appeal has been filed.
- Follow-Up: Follow up on other specific situations requiring case management action which are outlined in this Housing Manual (i.e. appeal hearings, family composition and income changes).

NOTE: For those sub-recipients operating Housing First projects, it is important to note that services must be offered to the participant and case management must be provided; HOWEVER, participants are not required to engage in services. **Attempting to engage the participant in services must be an ongoing process.**

Obligations of the Sub-recipient

NOTE: The sub-recipient may contract any or all of these obligations. It is the responsibility of the sub-recipient to ensure that all obligations are adhered to.

- Manage Coordinated Entry Prioritization: Assess applicants, monitor and consult the coordinated entry list for any and all housing projects.
- Conduct Applicant Briefings: Provide a briefing to educate applicants on the policies and procedures of the program. Review and update referral packet during the briefing.

- Recertify Participant Eligibility: Conduct, at a minimum, an annual eligibility assessment for participants and keep accurate documentation and verification of eligibility. Additional re-certifications may be required whenever participants experience changes in circumstances that substantially affect their overall eligibility for the program.
- Verify Unit Eligibility: Inspect the unit that a participant wishes to occupy, and which the landlord/owner has agreed to rent to the participant, to ensure that the unit meets Housing Quality Standards (HQS) in Continuum of Care programs and HOPWA TBRA or Habitability Standards in HTF and HOPWA STRMU. As long as the participant stays enrolled in the project, the unit must be re-inspected annually by the sub-recipient. A written report will be made and filed appropriately.
- Approve the Lease: Approve any lease or occupancy agreement signed between a landlord/owner and a participant enrolled in a project or between a landlord/owner and the sub-recipient. The purpose of the approval is to ensure that project-required lease provisions are included in the agreement. (See Chapter 2, Section I: "Lease Approval and HAP Execution for Scattered Site Tenant Based Rental Programs".) If the lease cannot be approved, the participant cannot receive assistance for that unit.
- Make Housing Assistance or Rent Payments to Landlords/Owners: Make monthly rental or lease payments to landlords/owners in accordance with the HAP or rental contract. These payments are generally made on or about the first day of each month.

NOTE: It is the responsibility of the sub-recipient to ensure that rental payments are being made to the correct legal party (i.e. owners sometimes change management companies).

- Provide On-going Housing Administration: Be responsible for handling on-going housing needs, including adjusting the total tenant payment, interim inspections, handling damage claims by landlord/owner, overpayments, repayment agreements, etc.
- Coordinate with Case Manager: Be responsible for communicating with and alerting a case manager when a housing situation arises that requires the involvement of the case manager.
- Conduct Landlord/Owner Outreach: Encourage landlords and owners of decent, safe, sanitary and affordable housing located outside areas of low income to lease units to families with rental assistance and to publicize their vacant and available units with the sub-recipient. Utilize www.socialserve.com to locate vacant rental units.
- Fulfill All Conditions of ADOH Contract: Fulfill all of the duties specified in the sub-recipient's contract with ADOH, including: the timely entry of participant data in the sub-recipient's HMIS database; maintenance of time records of staff time spent on

contract duties; and review, complete and submit Annual Performance Report (APR) to ADOH.

Obligations of Landlords/Owners

- Select Participants: Landlords/owners may screen prospective participants by contacting former landlords/owners for references as well as using other types of background checks they deem appropriate.
- Maintain Tenant/Landlord Relationships: Landlords/owners must comply with the provisions of leases and HAP contracts and the federal and applicable municipality Fair Housing Act; perform regular maintenance; and perform all management and rental functions as required by state landlord/tenant laws.
- Resolve Tenant/Landlord Disputes: The landlord/owner must notify the sub-recipient of any disputes between the landlord/owner and a participant and may request an informal meeting with the involved parties to attempt resolution.
- Handle Evictions Legally: If the landlord/owner evicts a participant, the eviction must be handled under the provisions of state landlord/tenant laws, just as for any other participant. The landlord/owner must give the sub-recipient written notice of eviction at the same time the participant is notified, even though the sub-recipient does not play a formal role in the eviction process.
- Supply Vacancy Information: Landlords/owners may participate on www.socialserve.com to list vacancies and should be encouraged to do so.
- Discrimination is Prohibited: The landlord/owner shall not discriminate against a participant on the grounds of race, color, religion, sex, national origin, disability or familial status.

Obligations of Applicants/Participants

- Cooperate in Fulfilling Program Requirements: The applicant/participant must provide income information and family information/documentation needed to permit the sub-recipient to certify eligibility and family composition and establish rent on an initial and annual basis. The applicant/participant must sign a release of information which allows personal information to be shared with ADOH, sub-recipients, landlords/ owners and applicable support service providers. The applicant/participant must also sign a release in compliance with HIPAA with their behavioral health agency. (See Attachment 1: "Release of Information Form".)
- Find a Qualified Unit: The applicant/participant must select a unit which falls under the guidelines of the program and which passes HQS or Habitability Standards (HOPWA

and HTF). The participant must allow the sub-recipient to inspect the dwelling unit before occupancy and at assessment.

- Compliance with Lease and Housing Agreement: The participant must conform to all lease requirements or housing agreement terms including allowing inspections of the unit.
- Report Changes in Income and Family Composition: This information should be reported to both the sub-recipient and the case manager. Participants are responsible for informing the sub-recipient of any changes in family circumstances (including income and family composition) and are responsible for responding to requests from the sub-recipient to update information.
- Comply with Program Policies: The case manager needs to inform the participant about program policies. These include, but are not limited to, the requirement that the unit be used as the participant's primary residence; giving proper notification before moving from the unit; and knowing that the participant shall be responsible for damages incurred in the unit over and above the one (1) month's rent allowed by program regulation.

CHAPTER 2: Applying for Housing Assistance

A. Eligibility

Eligibility varies with the program. In some instances, eligibility is further defined by program design (i.e. veterans, domestic violence survivors, HIV/AIDS, etc.).

Eligibility for Continuum of Care Permanent Supportive Housing

1. The applicant must meet HUD's definition of "disabled" and have applied to be a recipient of services through a contracted service provider. HUD defines "an individual with a disability as any person who has a physical or mental disability that substantially limits one (1) or more major life activities; has a record of such an impairment; or is regarded as having such an impairment [24 CFR 8.3]. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks and caring for oneself. The law also applies to individuals who have a history of such impairments as well as those who are perceived as having such impairment."
2. The applicant must meet HUD's definition of homelessness (see Attachment 2: "HUD Definition of Homeless") or access https://www.onecpd.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf, to qualify for Continuum of Care permanent supportive housing. Some grants are restricted to applicants who meet the definition of experiencing chronic homelessness. (See Attachment 3: "HUD Definition of Chronic Homelessness".)

Eligibility for Continuum of Care Rapid Re-housing

1. The applicant must meet HUD's definition of homelessness (see Attachment 2: "HUD Definition of Homeless") or access https://www.onecpd.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf, to qualify for Continuum of Care permanent housing.

Eligibility for HOPWA

1. The applicant must be diagnosed with Acquired Immunodeficiency Syndrome or related diseases as determined by a health professional competent to make such a determination.
2. The applicant must meet the income guidelines of the housing project for which applied.

Eligibility for Continuum of Care Transitional Housing

1. The applicant must meet HUD's definition of homelessness (see Attachment 2: "HUD Definition of Homeless") or access

https://www.onecpd.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf, to qualify for Continuum of Care Transitional Housing.

B. Coordinated Entry and Priority Policies

1. The BOSCO has agreed to implement a "no wrong door" policy for coordinated entry. In keeping with this decision, providers will be utilizing the VI-SPDAT to determine acuity rankings and to assist in making appropriate referrals and assessing eligibility for their projects and other projects within the Continuum. The VI-SPDAT is available in ServicePoint and must be used by all providers in implementing the "no wrong door" policy.
2. Per HUD Notice CPD-14-012, issued July 2014, priority will be given to those individuals and families who meet the HUD definition of "chronic homeless". If there is availability in a project and there is not an eligible household that meets the definition of chronic homeless, then the household with the highest acuity score based on the VI-SPDAT will be housed and the sub-recipient will then schedule a briefing with the applicant and case manager.

C. Documentation of Eligibility

1. Sub-recipients are responsible for verifying eligibility. HUD's regulations redefining homelessness has created specific requirements for documenting the homelessness status of applicants. Eligible applicants must also be income eligible for the permanent supportive housing programs, which is fifty percent (50%) or below of AMI. Eligible applicants must also have a disability. (See Chapter 1, Section G: Terminology). When determining eligibility, sub-recipient staff should be vigilant to document eligibility rather than rely on verbal communication with participant. All documentation shall be kept on file by the sub-recipient for each household participating in the project.

Requirements for documenting homelessness are:

For an individual or family sleeping in a place not designed for or used as a regular sleeping accommodation, including a car, park, abandoned building, bus or train station, airport, campground, etc.:	A signed and dated statement from agency staff/outreach worker or another identified third party which state the applicant's recent whereabouts describing in as much detail as possible location, dates and descriptions of places not meant for human habitation that individual(s) have slept. Must be on agency letterhead. As a last resort, self-certification is allowed.
For an individual or family living in a supervised publicly or privately operated shelter	A letter from the shelter facility verifying the date(s) of entry and/or exit and that the applicant(s) currently resides there or a printout from the Homeless

designated to provide temporary living arrangements including but not limited to emergency shelter, congregate shelters, hotels and motels paid for by charitable organizations or by government programs:	Management Information System (HMIS) showing recorded shelter stays. In addition a written observation by the case manager or homeless outreach worker verifying that the applicant(s) is/are homeless. This document must be on agency letterhead and must be signed and dated by the author.
For an individual or family living in a transitional housing project:	A letter from the transitional project verifying the date of entry and current residence; and documentation that the applicant(s) was either in an emergency shelter or a place not meant for human habitation immediately prior to entering the transitional project. This can consist of a letter from a shelter, on letterhead, an HMIS printout or if those are not available, a written observation of the applicant's former street homelessness.
For an individual who is exiting an institution where he or she resided for ninety (90) days or less AND was residing in an emergency shelter or place not meant for human habitation immediately prior to entering the institution:	A written verification from the discharging institution's staff, on agency letterhead that is signed and dated, stating that the applicant has been residing in the institution for less than ninety (90) days and is about to be discharged; and documentation that the applicant was either in an emergency shelter or a place not meant for human habitation immediately prior to the institutional facility. This can consist of a letter from a shelter, an HMIS printout or if those are not available, a written observation of the applicant's former street homelessness.
For an individual fleeing or attempting to flee domestic violence:	A written verification from staff of an emergency domestic violence shelter, law enforcement records or self-certification.

2. It is primarily the applicant's responsibility to provide adequate income documentation, whether at first-time lease up or at annual assessment, with the assistance of the case manager as needed. Applicants are required by law (24 CFR Sec. 582.310) to provide all such documentation as a condition of participation in the Continuum of Care programs.
3. Income from benefits or assistance can be documented by a form or letter issued by the agency providing the benefits, such as the Social Security Administration. Documentation of employment income must include either pay check stubs provided by the applicant or information obtained by the sub-recipient from the applicant's employer about current and

potential overtime, scheduled future pay increase and paid vacation and holidays. (See Attachment 4: "Verification of Income".)

4. If, after review, more information is required to verify an applicant's household income, the sub-recipient shall obtain it through additional written or personal third party contact with the appropriate entities. All information obtained through personal contact shall be documented in a memorandum and signed by the reporting sub-recipient staff member.
5. If the sub-recipient is unable to obtain necessary income documentation from either the applicant or third parties after making a documented good faith effort to do so, the sub-recipient may obtain certification from the applicant seeking assistance.
6. All applicants may be required to submit to the sub-recipient a copy of their most recent federal income tax form.
7. If more than sixty (60) days have passed between the time information was verified and the applicant briefing, it may be necessary to re-verify household income and expense information.

Requirements for documenting a disabling condition are:

Disabling Condition	Documentation Required
A disability as defined by Section 223 of the Social Security Act.	Verification of benefits from the Social Security Administration.
<p>A physical, mental or emotional impairment, including an impairment caused by alcohol or drug use, post-traumatic stress disorder or brain injury which:</p> <ul style="list-style-type: none"> • is expected to be of long-continued and indefinite duration; • substantially impedes an individual's ability to live independently; and • could be improved by the provision of more suitable housing conditions. 	<p>Written statement from a qualified medical professional that:</p> <ul style="list-style-type: none"> • identifies the physical, mental or emotional impairment; • explains why it is expected to be of long-continued or indefinite duration; • how it impedes the individual's ability to live independently; and • explains how the individual's ability to live independently could be improved by more suitable living conditions.
Developmental disability as defined in Section 102 of the Developmental Disabilities Assistance and Bill of Rights Act.	Written statement from a qualified medical professional that identifies a developmental disability.

Disabling Condition	Documentation Required
AIDS or any conditions arising from the etiologic agency for Acquired Immunodeficiency Syndrome.	Written statement from a qualified medical professional that identifies AIDS or related conditions.

Intake staff observations are only acceptable in the absence of third party verification and must be confirmed and accompanied by written third party verification no later than forty-five (45) days from initial intake.

D. Verification of Household Information

1. The applicant shall complete, sign and date all additional required forms at the briefing. In addition, all other adult household members shall sign all required forms.
2. Identification documents must be submitted for all household members. A valid driver's license or other acceptable picture identification (i.e. a state-issued non-driver identification or military identification) shall be submitted for all members who are eighteen (18) years of age or older; picture identification for children under eighteen (18) should be submitted if available. Birth certificates must be submitted for all children under the age of eighteen (18). Copies shall be placed in the applicant's file.
3. Applicants and family members must submit documentation of their complete and accurate Social Security numbers; a Social Security card or a letter from the federal Social Security Administration indicating the applicant's number. This requirement includes subsequent declaration in instances where a household adds a new member. Families currently receiving rental assistance payments must disclose information on additional household members at annual assessment time.
4. Applicants who are divorced or separated and claiming to have custody of minor dependent children may be required to provide a copy of their divorce decree or most recent court-approved child custody documents. Applicants who have custody of minor children at least fifty percent (50%) of the time may qualify for a larger size unit. For children returning home, the sub-recipient will require a letter with the child or children's names that are returning home and the date they will be returning.

E. Occupancy Standards

Sub-recipients may use Section 8 Occupancy Standards or use the following table for determining unit size:

Rental Assisted Unit Bedroom Size	Number of Persons	
	<i>Minimum</i>	<i>Maximum</i>
0	1	1
1	1	2
2	2	4
3	3	6
4	5	8

In addition, the family composition shall be taken into account and the bedroom size listed based on the following:

# of bedrooms	Family Composition
0	One (1) adult
1	One (1) adult or two (2) adults (couple)
2	Two (2) adults of the same or opposite sex living together in a non-conjugal relationship
2	One (1) adult and one (1) child
2	Two (2) adults (couple) and one (1) child
2	One (1) adult and two (2) same-sex children
2	One (1) adult or a couple and two (2) opposite sex children, both under six (6) years of age
3	One (1) adult or a couple and two (2) opposite sex children when one (1) child is at least six (6) years of age
3	One (1) adult or a couple and three (3) same sex children or opposite sex children all under six (6) years of age
3	One (1) adult or a couple and four (4) children (either all of the same sex or any combination where two (2) children of the opposite sex will not share a bedroom unless both are under the age of six (6) years)
4	One (1) adult or a couple and four (4) children, three (3) of the same sex and one (1) of the opposite sex, when all children are at least six (6) years of age

# of bedrooms	Family Composition
4	One (1) adult or a couple and any five (5) to seven (7) children, providing children do not have to share a bedroom with the parent(s) <u>or</u> with a child of the opposite sex when either is over the age of six (6) years

Requests for exceptions because of health needs or other circumstances shall be considered by the Special Needs Administrator on a case-by-case basis and must be accompanied by appropriate documentation, such as a doctor's statement.

F. Client Processing

1. Briefing sessions may be held individually or in small groups and shall be conducted by sub-recipient staff. Visual aids will be used as necessary.
2. Each applicant will receive a briefing packet containing the appropriate documents.
3. During the briefing, the sub-recipient staff shall inform the project applicant about all of the following items and provide written documentation where applicable:
 - a. The obligations of all persons residing in the assisted household. (See Attachment 5: "Housing Programs Household Obligations".)
 - b. The rights and responsibilities of landlords and/or owners.
 - c. The policy for privacy of participant information.
 - e. The general locations of the full range of areas in which the sub-recipient is able to execute lease contracts.
 - d. How to find a suitable unit. (See Attachment 6: "Tenant Information".)
 - f. Providers may want to consider providing a Landlord Packet to prospective landlords/owners. (See Attachment 7: "Owner Instructions".)
 - g. Information about potential lead based paint hazards in rental housing. (See Attachment 8: "Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards" or http://www.hud.gov/offices/lead/library/enforcement/selr_eng.pdf.) An informational pamphlet from HUD on lead-based paint hazards in homes and at work is available at http://www.hud.gov/offices/lead/library/enforcement/pyf_eng.pdf
 - h. Information about the size of rental unit (number of bedrooms), who can reside in the unit and the amount of rent the participant should look for when seeking housing. (See Chapter 2, Section E: "Occupancy Standards".)

- i. Information about computation of the total tenant payment and the HAP contract amount. (See Attachment 9: "Rent Calculation".)
- j. Federal, state and, where applicable, local Fair Housing Laws. The rights and remedies regarding housing discrimination will be explained. (See Chapter 1, Section E: "Fair Housing Policy".) Arizona Attorney General's Office hotline: (602) 542-5263 in Phoenix and (520) 628-6504 in Tucson. This link is for filing a Fair Housing complaint online: http://portal.hud.gov/hudportal/HUD?src=/topics/housing_discrimination
- k. The time period given the participant to locate a suitable unit is an initial thirty (30) day period with one (1) possible thirty (30) day extension.
- l. If sixty (60) days expire without locating a unit, the sub-recipient must hold a staffing which will include service provider staff and sub-recipient staff along with the applicant. With good cause as determined by the sub-recipient, time period may be extended for another thirty (30) days.
- m. The applicant will be informed of and encouraged to access the Registered Sex Offenders Website at http://www.azdps.gov/Services/Sex_Offender/ once they locate a unit.

G. Housing Inspection Standards

1. Any Continuum of Care unit or HOPWA TBRA approved for leasing or rental assistance payments must conform to the Housing Quality Standards (HQS) set forth in the Code of Federal Regulations and outlined in the HQS Inspection Form. (See Attachment 10: "Inspection Checklist" or Uniform Physical Condition Standards (24 CFR Part 5 subpart G and 200 subpart P.)) Inspections must be conducted by a certified inspector.
2. Any HTF or HOPWA STRMU unit approved for rental assistance payments must conform to the Habitability Standards set forth in the Code of Federal Regulations and outlined in the Habitability Inspection Form. (See Attachment 11: "Housing Habitability Standards Inspection Checklist".)
3. Prior to execution of the Housing Assistance Payments contract or lease/occupancy agreement, the unit will be inspected and the results documented on the Inspection Checklist for tenant-based assistance. If deficiencies are found, the landlord/owner shall be required to correct all deficiencies prior to execution of the Housing Assistance Payments contract. In some instances, the landlord may be the sub-recipient.
4. On initial inspection, the sub-recipient has the right to fail a unit if they feel the landlord/owner will not make the repairs in a reasonable time or if there are many deficiencies noted on the first inspection. The sub-recipient will notify the landlord/owner in writing that the unit has been rejected and that the project participant will be seeking another unit.

5. Each unit shall be inspected annually, at a minimum. If deficiencies are found, the landlord/owner and participant shall be informed in writing by the sub-recipient. The landlord/owner is responsible for completing all necessary repairs within thirty (30) days, as stated on the notice. All units failing inspection will be re-inspected to determine compliance. If a unit does not meet the appropriate standards within the timeframe set out on the Notice of Violation, Housing Assistance Payments may be withheld on the first day of the following month. If the required repairs are not completed within the next thirty (30) days, the Housing Assistance Payments contract may terminate immediately. When Housing Assistance Payments are withheld, both the landlord/owner and the participant are notified in writing. This notification will inform both of the possibility of contract termination.
6. Quality control inspections of participant units may be conducted by the ADOH SND staff.

H. Rent Reasonableness

1. It is required that all rents for scattered site units are "reasonable". Sub-recipients shall determine whether the rent being charged for an assisted unit is:
 - a. reasonable in relation to rents being charged for comparable unassisted units with similar features and amenities; and
 - b. not more than rents currently being charged by the same owner for comparable unassisted units.
2. Sub-recipients shall conduct an initial rent reasonableness survey and an annual rent reasonableness survey on units rented by project participants thereafter.
3. The rent for an assisted unit may not exceed the reasonable rent for that area even if FMR is higher.
4. Units in leasing programs may never exceed FMRs. (See Chapter 2, Section J: "Lease Approval" *"Leasing Rent Limits for Units"*.) Only tenant based rental assistance units may receive consideration for rents exceeding FMRs and must have prior written approval from ADOH SND which will be based on documentation provided.
5. A sample form showing a suggested rent reasonableness certification and checklist to document a rent reasonableness determination is included in this Housing Manual. (See Attachment 12: "Rent Reasonableness Checklist and Certification".) Sub-recipients are not required to use these specific forms, but some form of documentation comparing the same items must be kept in each file or on site and available to ADOH SND staff upon request. Sub-recipients must show at least three (3) comparable units to determine whether the proposed unit is reasonable.

6. It is imperative all sub-recipients be in possession of the most recent Fair Market Rent data. HUD's FMR data is updated annually and is found at www.huduser.org/datasets/fmr.html, and clicking on the current "Individual Area Final FY<year> FMR Documentation" link.

For those projects that are TBRA:

Rental is focused on the participant and is defined as the provision of rental assistance to provide transitional or permanent housing to eligible persons. Through rental assistance, sub-recipients help make housing affordable for program participants. The sub-recipient uses COC program funds to pay the difference between the contract rent of a unit and the participant's contribution toward rent.

I. Lease Approval and HAP Execution for Scattered Site Tenant Based Rental Programs

1. A lease is a legal contract between the participant and the landlord/owner. The HAP is a legal contract between the sub-recipient and the landlord/owner. The lease shall be reviewed by ADOH SND staff during annual monitoring.
2. When the participant has located a suitable unit, the executed Request for Tenancy Approval and a copy of the proposed lease shall be submitted to the sub-recipient. (See Attachment 13: "Request for Tenancy Approval" and Attachments 14A: "Arizona Residential Lease Agreement" and 14B: "Arizona Multihousing Association Apartment Rental Agreement".) Project information shall be provided upon request to every landlord/owner submitting a Request for Tenancy Approval. Additionally, sub-recipient staff is available for consultation.
 - a. No new Housing Assistance Payments contract or lease will be effective until the unit is inspected and meets the appropriate standard. Inspection reports must be completed and filed. (See Chapter 2, Section F: "Housing Inspection Standards".)
 - b. No new Housing Assistance Payments contract or lease will be effective until a rent reasonableness survey and certification is conducted for the new unit. (See Chapter 2, Section G: "Rent Reasonableness".) No increase in contract rent will be effective until a rent reasonableness survey and certification is conducted for the unit.
 - c. COC program funds used for rental assistance may exceed the current FMR for that unit size and location as long as the contract rent is reasonable. Sub-recipients must follow the HUD process for determining rent reasonableness. (See Attachment 12: "Rent Reasonableness Checklist and Certification".)
3. The sub-recipient's determination shall be submitted in writing to the landlord/owner and the participant will be contacted within no more than ten (10) working days of receipt of the Request for Tenancy Approval, providing the unit is available for the initial inspection

when the Request for Tenancy Approval is submitted. In cases where the unit is NOT immediately available for inspection, the sub-recipient's determination shall be made within ten (10) days after the sub-recipient is notified the unit is available for inspection.

4. If the tenancy is approved, the appropriate Lease and Housing Assistance Payments contracts shall be executed between the sub-recipient and the landlord/owner. (See Attachment 15: "Housing Assistance Payments Contract".) Prior to the execution of the lease, the sub-recipient must review the lease to ensure that its provisions do not conflict with this Housing Manual or with any program rules and are in the best interest of the participant. Such prohibited conflicts include *but are not* limited to:
 - a. The Lease shall not allow a participant to work for the landlord/owner in exchange for rent;
 - b. The Lease shall not be in effect for longer than twelve (12) months (initial lease must be for twelve (12) months and may transfer to month to month after this first year);
 - c. The participant shall pay no more than the amount of one (1) month's rent as a security deposit;
 - d. The participant shall not be held liable for the cost of repairing ordinary "wear and tear" to the rental property;
 - e. The landlord/owner shall abide by federal, state and local fair housing laws; and
 - f. The landlord/owner may initiate legal eviction proceedings based on violation of the terms of the Lease.
5. No participant shall move into a unit without a signed HAP contract and lease on file.
6. For units currently under contract, payments by the sub-recipient to the landlord/owner shall be mailed on the first business day of each month. For units coming into the project, prorated rent, calculated from date of move in, will be paid by the sub-recipient in accordance with lease requirements and after the Housing Assistance Payments contract is executed.

For those projects that are Leasing:

Leasing is focused on property. Leasing refers to the leasing of property, or portions of property, not owned by the sub-recipient for use in providing permanent housing. In projects that receive HUD leasing funds, the sub-recipient contracts for space from a landowner and therefore is responsible for the housing. The sub-recipient is expected to abide by the Arizona Landlord Tenant Act in their role as landlord.

J. Lease Approval

1. A lease is a legal contract between the sub-recipient and the landlord/owner. The lease shall be reviewed by ADOH SND staff during annual monitoring.

Occupancy Agreement or Sublease

The sub-recipient maintains occupancy agreement with each participant to formalize the participant's rights in the housing. For permanent housing, the agreement must be for at least one (1) year and be automatically renewable upon expiration. (See Attachment 16: "Occupancy Agreement for Leasing Programs".)

Eligible Leasing Costs

Leasing funds may be used to pay up to one hundred percent (100%) of the FMR for rent on:

- Structure for PSH or TH or for space to provide supportive services for project participants.
- Individual units to be used for PSH or TH.

Leasing Rent Limits for Units

Rents paid with COC program funds for individual units **may not EVER** exceed the FMR; however, providers are not prohibited from using other funds to pay rent amounts in excess of FMRs, though hopefully that will not be necessary.

It is important to note that use of COC program leasing funds is capped at the lower of rent reasonableness or FMR amounts. Example: Rent reasonable for a unit is \$600.00 and the FMR is \$633.00. The allowable rent payment is \$600.00.

If the sub-recipient leases a structure or unit that does not include utilities in the rent, the sub-recipient cannot pay for these utilities out of its leasing budget. The sub-recipient can require the project participants to pay for the utilities and provide a utility allowance when calculating the participant occupancy charge.

Alternatively, the sub-recipient could use COC program operating funds or other sources to pay the utilities. In the case when a sub-recipient is leasing space to deliver supportive services, utilities are eligible as a supportive services cost because they are part of the cost associated with delivering the services.

K. Required Annual and Interim Assessments

1. Annual assessment is a required annual verification for current participants and must be completed within thirty (30) days of the participant's anniversary of project participation.
 - a. household income;
 - b. household composition;
 - c. consideration of service needs;
 - d. ROI form;
 - e. HMIS Client Acknowledgement Form;
 - f. project agreement;
 - g. Participant Satisfaction Survey (to be returned to ADOH SND);
 - h. continuing HQS/UPCS compliance; and
 - i. rental documents.

The amount of rent a project participant pays toward their contract rent may be increased or decreased as a result of changes documented by the assessment process.

2. An interim assessment is a verification of changes in income or composition reported to the sub-recipient by the project participant. Such changes must be reported to the sub-recipient office in writing within thirty (30) days of the change and must include the signature of the participant. Interim assessments shall be conducted at any time such changes are reported if it would increase the participant's rent by fifty dollars (\$50.00) or more or if it decreases the participant's rent. Interim assessments do not require a new HQS/habitability inspection.
3. Documentation of household income, household composition, the extent of medical or other allowable household expenses and on-going case management shall be obtained/maintained in writing by the sub-recipient. (See Attachment 17: "Continuum of Care Recertification Form".) Sub-recipient staff shall make an appropriate determination as to the new amount, if applicable, of the total tenant payment and the amount of the Housing Assistance Payment, if applicable, all in accordance with the schedules and procedures established by the Code of Federal Regulations.
4. Assets will be verified in same manner as when the participant entered the project. Written documentation of case management may be obtained by contacting the case manager of record.
5. All participant rental units shall be inspected by a qualified housing inspector as part of the annual assessment process to ensure that HQS/Habitability continue to be met. (See

Attachment 18: "Recertification and Inspection Notice Letter".) Participants shall be notified in writing on the impending assessment and inspection at least thirty (30) days in advance.

6. Households reporting the addition of a household member shall provide identification documentation for the new member. The new household member must sign a certification if they have not been assigned a Social Security Number. If the new household member is under the age of eighteen (18), his or her parent or guardian must execute the certification. If the new household member who has signed a certification form obtains a Social Security Number, the number must be disclosed as soon as it is given to the new household member.
7. The sub-recipient may use other official documents that contain the Social Security Number as a method of securing social security information.
8. During the assessment process, the sub-recipient shall provide the participant with a Participant Satisfaction Survey. (See Attachment 19: "Participant Satisfaction Survey".) Each participant should be asked to fill out this optional survey document and return it to the sub-recipient or its representative in a pre-addressed envelope (to protect confidentiality of the survey). Sub-recipient staff should then forward completed surveys by mail or fax to ADOH SND.

L. Termination of Rental Assistance

1. The sub-recipient may terminate rental assistance payments in accordance with federal regulations, ADOH Housing policies, the Housing Assistance Payment contract and Household Obligations. All participants must be given the opportunity to attend a hearing on the matter before rental assistance can be terminated. (See Attachment 20: "Notice of Termination of Rental Assistance Letter"; Chapter 3, Section A: "Informal Review"; and Chapter 3, Section B: "Formal Review".)
2. **The sub-recipient shall not terminate a project participant from rental assistance without prior written approval from ADOH SND.**
3. Participants may voluntarily terminate their own participation in a project. (See Attachment 21: "Program/Lease Voluntary Termination Letter".)
 - a. If the participant wishes to terminate their participation in the project but continue living in the same rental unit under the same lease and pay their own rent, the participant need only inform the sub-recipient in writing that they wish to terminate rental assistance.
 - b. If the participant wishes to terminate their participation in the project and vacate the current rental unit, they must do so in accordance with the lease document. They must advise the sub-recipient and the landlord/owner in writing of their intention to do so at least thirty (30) days prior to vacating the unit.

M. Termination of Lease and Moving

During the initial twelve (12) month period of project participation, the participant may not move. After the initial twelve (12) month period, the household may not move more often than one (1) time per year. In such cases, the participant must provide written documentation of his/her need to move, including statements from doctors, employers or school counselors. If the participant asks to move in the middle of any lease term, permission may be granted only with a written statement from the landlord/owner releasing the participant from the lease. Under certain circumstances involving, for example, health, employment needs or education, ADOH SND may waive these limitations.

N. Eviction

The landlord/owner may evict the participant household from the contracted unit only by instituting a court action. The landlord/owner must notify the sub-recipient in writing of the commencement of procedures for termination of tenancy at the same time that the landlord/owner gives notice to the participant under state or local law. Eviction does not equal termination from the housing rental project. Final termination from the housing rental project may only be approved by ADOH SND. This also applies when the sub-recipient is the landlord/ owner.

In accordance with the Violence Against Women Act (VAWA), a participant or lawful occupant who engages in criminal acts of physical violence against affiliated individuals or others may be evicted or removed without evicting or removing or otherwise penalizing a victim who is a lawful participant or occupant. The victim has sixty (60) days by which he/she may establish eligibility for the project. If the victim cannot establish eligibility, the sub-recipient and landlord/owner must give the victim thirty (30) additional days to find housing or establish eligibility under another covered housing program. (The Violence Against Women Reauthorization Act of 2013: Overview of Applicability to HUD Programs [Docket No. FR-5720-N-01] Federal Register, Vol. 78, No. 151, August 6, 2013.)

O. Family Break-up (Divorce or Death)

1. When a participant's household breaks up, the rental assistance remains with the eligible participant (i.e. the person receiving rental assistance through the sub-recipient). Participants may be asked to move to a smaller unit to reflect occupancy standards.
2. If the participant member of the household dies, the remaining family members have sixty (60) days by which to establish eligibility for the project. If the family cannot establish eligibility, the sub-recipient and landlord/owner must give the family thirty (30) additional days to find housing or establish eligibility under another covered housing program.

Final termination of rental assistance may only be approved by ADOH SND.

P. Retention of Assistance

For vacated units, the interim rule provides that assistance may continue for a maximum of thirty (30) days from the end of the month in which the unit was vacated, unless the unit is occupied by another eligible person. If the household participant is absent (i.e. in jail, in the hospital) from the unit for more than ninety (90) consecutive days, rental assistance payments will terminate. Absence from the unit means no family member listed on the lease is living there. Final termination of rental assistance may only be approved by ADOH SND. The participant's rent portion must be paid during absence.

Q. Landlord/Owner Participation

1. Landlords/owners are required to provide the following in writing prior to execution of the HAP:
 - a. proof of ownership;
 - b. name, address and telephone number;
 - c. name(s) of agents or managers who are authorized to act in their behalf and/or sign documents;
 - d. tax ID or Social Security Number; and
 - e. corporate status.
2. As provided in 24 CFR Section 982.306, the sub-recipient may not approve a unit if the landlord/owner:
 - a. is known to have violated obligations under a HAP;
 - b. has committed fraud, bribery or any other corrupt or criminal act in connection with any federal housing program;
 - c. has engaged in any drug-related criminal activity or any violent criminal activity;
 - d. has a history or practice of non-compliance with the HQS for units leased under the tenant based programs or with applicable housing standards for units leased with project-based Section 8 assistance or leased under any other federal housing program;
 - e. has a history or practice of failing to terminate tenancy of participants of units assisted under Section 8 or any other federally assisted housing program for activity engaged in by the participant, any member of the household, a guest or another person under the control of any member of the household that:
 - i. threatens the right to peaceful enjoyment of the premises by other residents;

- ii. threatens the health or safety of other residents, of employees or contractors of the sub-recipient or of employees of the landlord/owner or other persons engaged in management of the housing;
- iii. threatens the health or safety of, or the right to peaceful enjoyment of their residences, by persons residing in the immediate vicinity of the premises;
- iv. is involved in any drug-related criminal activity or violent criminal activity;
- f. has a history or practice of renting units that fail to meet state or local housing codes; or
- g. has not paid state or local real estate taxes, fines or assessments.

For purposes of this section, "landlord/owner" includes a principal or other interested party.

3. Listing an applicant on the wait list or selecting an applicant for participation in the project is not representation by ADOH or the sub-recipient to any landlord/owner about the applicant or the applicant's household members' expected behavior or their suitability for tenancy. Landlords/owners are permitted to screen applicants on the basis of their tenancy histories. A landlord/owner may consider the applicant's background with respect to such factors as:
 - a. payment of rent and utility bills;
 - b. caring for a unit and premises;
 - c. respecting the rights of others to the peaceful enjoyment of their housing;
 - d. drug-related criminal activity or other criminal activity that is a threat to the life, safety or property of others; and
 - e. compliance with other essential conditions of tenancy.

Landlord/owner must comply with Fair Housing and Arizona Landlord Tenant Law.

4. In accordance with the Code of Federal Regulations, the sub-recipient may give the landlord/owner the following information about an applicant:
 - a. name and address (as shown in the sub-recipient's records); and
 - b. the name and address of the landlord/owner at the applicant's current and prior address, if applicable.

R. Security Deposits

1. The initial security deposit for the participant will be paid by the sub-recipient. ADOH SND Housing Programs will not pay security deposits in excess of one and one-half (1 ½) month's rent.

2. When the participant moves out of the rental unit, the landlord/owner, subject to state and/or local law, may use the security deposit, including any interest on the deposit, in accordance with the lease, as reimbursement for any unpaid rent payable by the participant, damages to the unit or for other amounts the participant owes under the lease.
3. Within fourteen (14) days, excluding Saturdays, Sundays or other legal holidays, after termination of the tenancy and delivery of possession and demand by the participant, the landlord/owner shall provide the sub-recipient an itemized list of all deductions together with the amount due and payable to the sub-recipient, if any. Returned security deposit funds may be used for the participant on another unit, or in the event the participant leaves the project, the funds stay with the project.
4. Subsequent security deposits must be paid by the participant. ADOH SND may authorize payment of additional security deposits under exceptional circumstances (i.e. forced to move due to domestic violence, etc.); where such circumstances may exist, the sub-recipient staff must contact ADOH SND staff for authorization.

S. Utility Allowance

If operating a Rental Assistance Project, the following applies:

If utilities are not included in the lease, utility allowances are calculated by the sub-recipient as described below. For most households the utility allowance is given by deducting the allowance from the amount of rent the household owes each month. In some cases, a utility reimbursement will be owed to the participating household. Such reimbursements are paid directly to the utility provider of the participant's choice. (See 3 below.)

1. To determine the appropriate utility allowance, the sub-recipient may obtain utility allowance schedules for their area from the local Public Housing Authority. (See Attachment 22: "Allowances for Tenant-Furnished Utilities and Other Services".) The appropriate utility allowance schedule will be selected for each client based on the utilities in the unit and the trash removal services in each area.
2. It is essential that sub-recipients obtain and use only the most current utility allowance schedules from the appropriate Public Housing Authority.
3. Utility reimbursements are paid directly to utility providers. Participants must select the utility provider to receive the payment. This information must be provided by the participant in writing, along with a copy of their most current utility bill. (See Attachment 23: "Utility Reimbursement Payment Form".) This information shall be collected from the participant when the Lease Agreement or HAP is executed and each year at annual assessment. However, it is important for sub-recipients to note that leasing dollars may not

be used to pay for utilities unless the rent calculation results in the negative which creates a "utility reimbursement".

4. When documenting the information above, sub-recipient staff should also ensure that the utilities account in question is in the name of an adult living in the assisted household.

T. Adjustments of Tenant Rent

When a household's income increases or decreases, the participant rent shall be adjusted if increase in rent paid is more than \$50.00 or if income decreases. The increase adjustment shall be effective the first day of the second month following the date of the increase. (For example, if the increase is effective January 20th, the effective date would be March 1st.) The decrease adjustment shall be effective the first day of the month following the date the income change was reported by the family. The adjustment must be completed immediately if income decreases. The "date reported by the family" is the date the family completed the Report of Change in Household Composition or Income Form and all verification forms required by ADOH Housing. Adjustments of participant rent shall be made in accordance with assessment procedures.

CHAPTER 3: Review Process

A. Informal Review

1. A sub-recipient shall conduct an informal review (staffing) when a participant is experiencing problems relating to their rental unit, support services or outside causes.
2. The informal review will involve at a minimum the participant, the participant's case manager and a sub-recipient staff person. The meeting may be conducted in person or by telephone.
3. Sub-recipient staff shall be responsible for documenting the informal review. (See Attachment 24: "Review Documentation Form".)

B. Formal Review

1. If a participant's rental assistance is subject to termination because of violations described in Chapter 2, Section J: "Termination of Rental Assistance", the participant must be offered due process in the form of a formal review before termination. The sub-recipient has responsibility for scheduling the formal review, notifying all parties and documenting the proceedings of the formal review. (See Attachment 20: "Notice of Termination of Rental Assistance Letter" and Attachment 24: "Review Documentation Form".)
2. The final decision at this level must be made by someone in a supervisory position to the sub-recipient staff making the initial determination.
3. The participant may be represented by legal counsel or other representative at their own expense.
4. Prior to termination from the project, **ADOH SND staff must approve the termination in writing after receiving an explanation regarding the circumstances along with all attempts that have been made to resolve this situation.** This may be by email.

CHAPTER 4: Project Reporting

A. Project Monitoring and Evaluation

The sub-recipient will be monitored annually by ADOH SND. The review will be scheduled in advance on a date that is mutually agreed upon and ADOH SND shall send confirmation in writing. The review may result in more than one (1) visit depending on the outcome of the initial report.

ADOH SND staff typically reviews sub-recipients in the following areas (See Attachment 25(A, B or C): Monitoring Tool):

1. Compliance with the policies set forth in this Housing Manual, including but not limited to:
 - a. accuracy of participant rent calculations and payments;
 - b. conducting Rent Reasonableness surveys;
 - c. maintenance of accurate, organized and accessible participant records;
2. Compliance with the terms of the sub-recipient's ADOH contract, including but not limited to:
 - a. timely entry of participant data in the sub-recipient's Homeless Management Information System;
 - b. maintenance of staff time sheets documenting the amount of time spent on housing project activities;
 - c. meeting HUD goals; and
 - d. financial management.
3. Compliance with local, state and federal fair housing laws and ordinances.
4. Compliance with HUD requirements, including conflict of interest requirements.
5. Compliance with HUD requirements on participation of homeless or formerly homeless individuals on the agency board or equivalent policymaking entity and in developing project components.
6. Compliance with HUD Data Standards which can be found at <https://www.hudexchange.info/resources/documents/HMIS-Data-Standards-Manual.pdf> and the HMIS Policies and Procedures adopted by the AZ BOSCO available on the ADOH website at https://housing.az.gov/sites/default/files/documents/files/HMIS%20Policies%20and%20Procedures_0.pdf.

A written report of the review shall be completed by ADOH SND staff and mailed within thirty (30) days of the review to all involved parties, which may include executive level staff and/or the Board President of the sub-recipient.

If a response is required, it must be received by ADOH SND within thirty (30) days of the date of the report.

B. Homeless Management Information System (HMIS)

HMIS is a database for homelessness information maintained by each Continuum of Care in the state.

By contract with ADOH, all sub-recipients are obligated to enter client data into the HMIS on a continual basis as defined by the Data Quality Plan and the AZ BOSCOC HMIS Policies and Procedures Manual. The sub-recipient shall be called upon to pull participant data in order to assist ADOH SND in the production of HUD Annual Performance Reports and strategic planning. Sub-recipients will comply with all HMIS governance, along with policies and procedures.

C. Financial Management

Sub-recipients are responsible for mailing ongoing monthly rent or HAP checks to landlords/owners and utility companies in a timely manner. Sub-recipients are also responsible for submitting to ADOH SND monthly Request for Payment (RFP) for rent, HAP checks, utility reimbursements, security deposits, administrative fees and all other payment adjustments in a timely manner.

For specific questions about monthly invoice processing, sub-recipient staff should contact their ADOH SND Contract Specialist.

ATTACHMENTS

Attachment 0A:	Transitional Homeless Certification Form (Required)
Attachment 0B:	Permanent Housing Homeless Certification Form (Required)
Attachment 1:	Release of Information Form (Generic; <i>must include ADOH in release</i>)
Attachment 2:	HUD Definition of Homeless
Attachment 3:	HUD Definition of Chronic Homelessness
Attachment 4:	Verification of Income (Generic)
Attachment 5:	Housing Programs Household Obligations (Generic)
Attachment 6:	Tenant Information (Generic)
Attachment 7:	Owner Instructions (Generic)
Attachment 8:	Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards (Required)
Attachment 9:	Rent Calculation (Generic)
Attachment 10:	Inspection Checklist (Required)
Attachment 11:	Housing Habitability Standards Inspection Checklist (Required)
Attachment 12:	Rent Reasonableness Checklist and Certification (Generic)
Attachment 13:	Request for Tenancy Approval (Generic)
Attachment 14A:	Arizona Residential Lease Agreement (Generic)
Attachment 14B:	Arizona Multihousing Association Apartment Rental Agreement (Generic)
Attachment 15:	Housing Assistance Payments Contract (Generic)
Attachment 16:	Occupancy Agreement for Leasing Programs (Generic)
Attachment 17:	Continuum of Care Recertification Form (Generic)
Attachment 18:	Recertification and Inspection Notice Letter (Generic)
Attachment 19:	Participant Satisfaction Survey (Required)
Attachment 20:	Notice of Termination of Rental Assistance Letter (Generic)
Attachment 21:	Program/Lease Voluntary Termination Letter (Generic)
Attachment 22:	Allowances for Tenant-Furnished Utilities and Other Services (Generic)
Attachment 23:	Utility Reimbursement Payment Form (Generic)
Attachment 24:	Review Documentation Form (Generic)
Attachment 25A:	Monitoring Tool (Required)
Attachment 25B:	HTF Monitoring Tool (Required)
Attachment 25C:	HOPWA Monitoring Tool (Required)